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CITY OF SAN DIEGO
MAR 13 2002
PLANNING DEPARTMENT

**SUBJECT: "THE CITY OF VILLAGES GROWTH STRATEGY -
STRATEGIC FRAMEWORK ELEMENT DEIR"
(LDR No. 40-1027/SCH No. 2001061069)
To Replace "Guidelines for Future Development"
in the City of San Diego Progress Guide and General Plan**

Dear Mr. Monserrate:

This proposed General Plan amendment and implementing actions are the City's first hurdle in persuading the public that increasing homes by 17,000-37,000 over approved densities by 2020 is both necessary and, possibly, beneficial to San Diego's communities. In our view, the DEIR fails to accomplish this feat by weak assessment of impacts, faulty postulations, and by minimizing the key role each individual community must play if this plan were to succeed.

A-1

As have most of the City's 43 communities, Carmel Valley residents have followed progress to date through regional workshops, Board participation in planning the "City of Villages", and review of Strategic Framework Element maps, such as the "Transit First Network for the North City Communities" (viz. our September 11, 2001 letter to Colleen Clementson.) Any unanswered questions or concerns awaited this DEIR for clarity and specificity.

The most troublesome issues listed below are representative of similar flaws throughout the DEIR; these key issues cited guide the balance of the document: **I Land Use; II Transportation/Circulation; and III Environment/Open Space Issues:**

STAFF RESPONSE A-1: Comments are duly noted. It should be noted that the distributed DEIR disclosed the scope of the EIR (p. I-12) and the uses of the EIR (pp. I-12 and 13). The purpose of EIR is to analyze the adverse environmental impacts of the proposed project; other than disclosing the probable, required subsequent review process prior to the actual development of a village or transit corridor, the DEIR focused on impact analysis pursuant to CEQA, and not on clarification of the proposed project. The specificity of the EIR analysis reflects the inherent low specificity of the General Plan, policy-level proposal, the adoption of a new strategy to guide future growth and development. The specificity of the impact analysis conducted in the distributed DEIR is appropriate for the proposed City of Villages strategy (pursuant to CEQA Guidelines Section 15146). The Strategic Framework Element and Action Plan include policy and specific direction respectively, regarding the importance of the role of community planning groups.

The City of Villages Strategy will require community plan updates and amendments to implement village development as such Community Planning Groups will play a key advisory role.

I Land Use (Introduction ii, iii; IV 1-21; and "Attachments")

A-2 Environmental review of the entire "Strategic Framework Element" package begins with this "Programmatic EIR", which would amend the growth policies of the Progress Guide and General Plan, incorporating its "Action Plan" and "Transit Oriented Development Overlay" over "potential villages." Following would be a "Master EIR...upon selection of several specific pilot village locations." Although a Master EIR would "require some form of additional 'community/site-specific' environmental review..." the findings of the original EIR would be the basis of determining impacts. Clearly, this is a policy formation process in which policy adoption is preceding detailed analysis.

In other words, the current "City of Villages" EIR review is the basis of any future findings. If an action proposed in the City of Villages plan reviewed here is determined to have no impact on a community, then any subsequent "village" project proposed would be considered to have no impact unless it varied with the goals proposed here. (Attachment: "Proposed Project Description...p. 6)

A-3 The defining rhetoric of this point is the DEIR conclusion on "Land Use Consistency": Although "the proposed City of Villages strategy, the Strategic Framework Element, would retain the intent of the current community, specific, subarea, and park plans' environmental goals and policies" (introduction ii), the conclusion of the DEIR is that "the proposed growth policy would not pose a significant land use impact" because (introduction ii-iii):

"According to the City's significance guidelines, inconsistency/conflict with the environmental goals, objectives, or guidelines of a community plan...would be considered a significant land use impact. However, the proposed City of Villages strategy...is an update of the City's Progress Guide and General Plan...As community plans are subsequently updated to allow the implementation of the City of Villages...the community plans goals and policies would be changed to reflect the new growth policy.

Any remaining doubt as to how community plans would have to comply with an adopted "Strategic Framework Element" is erased in "III Project Description": "the (Element) is designed to guide the update of the entire 1979 Progress Guide and General Plan and City's 43 community plans through 2020."

A-4 Our concern is simple: the success of the better "villages" planning strategies depends completely upon a community's ability and desire to incorporate more density and development mix. We consistently have pushed for "self determination" in our discussions with City staff and elected officials if the "City of Villages" is to avoid the mistakes of the "Renaissance Commission" changes which were eventually scuttled by public outcry. Communities have long harbored ill will toward City policy which denies them their direct role in solving traffic solutions, growth patterns, etc. A basic DEIR finding is that if the Strategic Framework Element impacts a community plan the way to remedy this is to change the community plan. This is a very unstable beginning of a public acceptance process. And, a logically circular argument

STAFF RESPONSE A-2: Comment noted. It should be noted that while the findings of this current EIR are the basis of determining impacts, required subsequent CEQA review must conduct an initial study to reconsider all impacts on a site-specific and/or localized, community level. This current, initial program-level EIR may serve to reduce the level of subsequent analysis required for regional issues, alternatives, and cumulative impacts.

STAFF RESPONSE A-3: As suggested by the previous Staff Response A-2, it is incorrect to suggest that this COV/SFE EIR definitively determined that the proposed strategy would not have any impact on a community level nor that in determining so, relieves the subsequent environment review of any impact review. For instance, any adverse community character effect determined not to be significant on a citywide policy level needs to be addressed at community or neighborhood level when the implementing plan or zone is proposed for intensification and/or when a site-specific village/corridor development is proposed. To address this impact now in this document on a General Plan policy level and without site-specific detail, would be speculative. CEQA does not require speculative impact analysis. This is especially pertinent to the current proposal which is a phased planning process with planned, phased discretionary approvals and required subsequent tiered CEQA review. In another instance, traffic impacts would need to be further considered on a more localized scale with required subsequent CEQA review.

Regarding the land use determination, if the City Council approves the City of Villages strategy, this policy would become the overarching, city wide direction the City would follow plans for growth and to shape its urban form. Once adopted, community plans, as necessary, will be amended to be consistent with the city wide strategy to guide future growth and development.

Specifically, the land use analysis of the distributed DEIR disclosed that the proposed strategy to guide future growth and development, with its proposed mixed uses, transit orientation, and improved walkability may potentially result in the reduction of the amount of parking required. This possible reduction is not consistent with some current community plans which call for the preservation of existing parking. When updated and if these plan areas choose to incorporate mixed use, intensified villages and transit corridors, community plans and policies would need to be made consistent with the adopted strategy. This is the only identified community plan inconsistency with the proposed City of Villages strategy. It should be noted that the environmental goals and policies of the existing community plans listed in the distributed DEIR, would be consistent with the new strategy and would not be required to be changed with the adoption of the new strategy.

STAFF RESPONSE A-4: Comments noted. It should be noted that the cited "basic finding" in the distributed DEIR only applies to community plan parking goals in the land use discussion. In terms of community input, the initial pilot villages would be selected by the City Council; included in the draft selection criteria is the provision for general community acceptance and public support. For subsequent community plan updates, this provision for community acceptance and public support would be a major consideration in addition to selecting older communities ripe for redevelopment and infill. The revised 4th Draft City of Villages map included in the distributed DEIR, attempted to identify potential opportunity areas where villages and transit corridors could be subsequently sited; many potential village sites initially rejected by the community, were removed. Therefore, the map does not mandate the location and density of future villages, but represents a starting point for later community input and refinement via subsequent community plan updates/amendment process. However, it should be noted that some community group recommendations may be inconsistent with citywide goals, and therefore not supported by staff. Staff has a responsibility to assess whether citywide environmental, housing, equity, and other goals have been met, and to forward that information on to the decision-makers.

A-5

"One size fits all" is anathema to San Diego's active citizens. In our experience at the Community Planners Committee, the communities all recognize their uniqueness and mutually respect individual community histories, even idiosyncrasies. Certain overall City policies (such as open space preservation, canyon preservation, improvement of watershed quality, etc.) have been enthusiastically embraced; solving a community's growth problems, however, has been recognized as a tool best left to the individual community.

A-6

Recently planned/developed communities and older communities have different infrastructure needs and planning principles in place. An example of how communities differ is in parking needs in residential and mixed zones: Several references are made to the plan's goal to reduce parking in "villages." P. IV-3 under "Land Use - Parking": "Most current community plans specifically provide for adequate parking. The goal and objective of the proposed project is to eliminate the need for parking due to expanded and improved public transit system..." Further, "the proposed (Transit Oriented Development) overlay [which would be approved with this project final EIR] would reduce the parking requirement of a new development if minimum site design features are incorporated..." The "Neighborhood Quality" section of the "Proposed Project Description" ("Attachments"): includes the goal of "reduc[ing] parking standards for each affordable housing unit..."

A-7

Carmel Valley has had such problems with insufficient parking in its commercial and retail centers that in 2001 we had to amend our PDO to raise the base ratio. Parking using the City standards simply was not working when office spaces were divided, employees increased, and parking was fixed. Our residential neighborhoods had to impose timed parking on even the smallest residential streets in our major neighborhoods. In the proposed "village center" for Carmel Valley, the "Town Center" area which has the potential for a true community center, already the ratios are barely sufficient because in our case this "village center" has a regional draw. The center's shopping, library, middle school and recreation center do not just serve Carmel Valley but adjacent communities. Further, the entertainment venues and playing fields attract and host people from throughout the region.

A-8

Although older communities have far worse infrastructure problems than newer communities, each of the 43 communities would be affected through the adoption of the Strategic Framework Element. As communities are asked to incorporate more density, the existing shortage of public facilities is made even more manifest, and an increase of density causes major alarms. In our case, when the community was master-planned, the level of public facilities included was based on the planned densities. If we are asked to intensify, how will the required public facilities, such as population-based, active-use parks, or roads, or schools be funded? Where will the land for these facilities be found?

Carmel Valley continues to seek a better housing mix and to intensify on the little remaining land. However, finding answers to these problems and ensuring that the quality of life in the community is upheld are community-specific tasks. In our view, the EIR should be revised to emphasize the essential role communities should play in carrying out the general "City of Villages" policies.

STAFF RESPONSE A-5: The proposed Strategic Framework Element, the City of Villages strategy, is proposed to become a part of the City's Progress Guide and General Plan. As part of the General Plan, this proposed strategy directs the future growth and development citywide. While the proposed strategy is appropriate as a citywide direction, its application in each community can be tailored to fit the neighborhoods with community input during the subsequent community plan amendment/update process to implement the City of Villages strategy.

STAFF RESPONSE A-6: The automobile is one of the biggest users of space in the urban environment. The proposed City of Villages strategy seeks to create conditions that will reduce the demand for parking, and the space devoted to the automobile, through factors including: mixed-use development; comfortable, attractive sidewalks; multiple and direct pedestrian street connections; high quality transit service; improved bicycle facilities; and use of parking management tools. The strategy also recommends more shared use of parking spaces and the development of community parking structures to help address today's parking needs while planning for a less auto-dependant future. The Transit Oriented Development (TOD) Guidelines are a tool that can be used to reduce parking requirements at a project level, where appropriate, in conjunction with the processing of a discretionary permit. In some cases, projects should be designed to allow a transition from a greater number of parking spaces to a lesser number over time, as village-like character and transit services are phased in.

STAFF RESPONSE A-7: CEQA does not require the discussion of economic effects. However, as part of the City of Villages planning effort, a draft financial consultant report entitled, "City of San Diego, Facilities Financing Report" (April, 2002), has been prepared. This study outlines the possible funding mechanism to provide needed facilities.

A framework for providing the needed facilities will occur through an update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

STAFF RESPONSE A-8: The distributed DEIR focused on impact analysis pursuant to CEQA, and not on clarification of the proposed project or specifics on the project implementation. See previous Staff Responses A-3 (Paragraph 1) and A-5.

Instead, the DEIR emphasizes that community plans will be revised to conform with the PG & GP. This, to us, is not the intent of elected officials, nor ours, when we attempt to embrace a policy to accommodate a projected 350,000 population increase (City alone) from 1990 to 2020, building 17,000-37,000 new homes, and generating 240,000 additional travel trips on a City road system of which 77 miles currently operate at a failed LOS F efficiency.

A-9 A partial remedy for this DEIR and policy flaw would be to adopt the suggestions offered in the "Comments on the Scope of Work" by a University City Planning Group member: "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... 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."

II Transportation/Circulation (Introduction iii; IV 22-27)

The DEIR is patently clear about the unmitigated traffic impacts of adding 17-37,000 more housing units to what is currently planned city-wide:

"The proposed project combined with regional efforts by SANDAG and MTDB's Transit First program could encourage the additional residents...to choose alternative less impactful, transportation modes....HOV facilities (etc.)...The modeling for the proposed City of Villages strategy showed a conservative limited effect of the proposed villages on its resultant increased walking and transit use. These measures are partial mitigation at best, and significant future traffic congestion impacts will not be reduced to below a level of significance." (Introduction iii)

A-10 In fact, "the modeling indicated only about a six percent reduction in all travel trips attributable to transit use and walking."

It is disheartening to read in this DEIR that even with an adopted "Transit First" policy, implemented with billions of currently unidentified dollars, traffic levels throughout the City will worsen from today's dismal standards, even though "the envisioned improved transit services is expected to result in significant gains." (I-3) However disheartening these projections are, the public must be fully informed if we as a City are to tackle growth at whatever level.

Beyond this, the EIR could be vastly improved in two ways: (1) ensuring that its traffic figures are correct, even if the significance of impacts are worsened; and (2) providing more detail on the "Transit First" proposals, such as explication and inclusion of the "Transit First Network for the North City" maps. (Our September 11, 2001 letter points out how this proposal could be improved in Carmel Valley.)

STAFF RESPONSE A-9: Refer to previous Staff Response A-3 (Paragraph 3). The only issue that the distributed DEIR disclosed that some community plans may need to be made in conformance with the proposed City of Villages strategy, is parking. (Refer to previous Staff Response A-6.) The environmental goals and policies of the existing community plans would be consistent with the proposed strategy and would not be required to be changed with the adoption of the new strategy. Density levels would be tailored per community through the community plan update/amendment process. Historically, community planning groups have served as "local panels" and they have worked in tandem with staff and other interested groups to develop community plan policy.

STAFF RESPONSE A-10: The traffic modeling result in the distributed DEIR, showed that there would be an overall transit walking mode split of six percent; this has been revised to 9% to 10% transit, walking, and bicycling trips of total trips. The relatively small percentage was the basis for the determination that the significant traffic impact was only partially mitigated and that this significant impact would be unmitigated; this determination remains the same.

The 9% to 10% due to transit, walking, and bicycling is a citywide, 24-hour average. However, congestion has its biggest impact on people's lives in key corridors, during peak commute times. Transit is ideally suited for these critical peak periods, because there are many people traveling the same route, at the same time. If fact, the EIR reports that 18% of all home-work trips will be by transit and walking with implementation of the City of Villages and the Transit First network, in the year 2020. This figure would be even higher in key corridors where the best regional transit services are planned. For comparison, existing peak hour, home-work transit and walking trips total 6.7%. The EIR, with its conservative approach, also minimizes the impact of the City of Villages on transit ridership by including the Transit First network in the 2020 existing conditions traffic model, even for the "existing conditions (non-City of Villages) scenario. In reality, it is highly unlikely that the Transit First network could be implemented in the absence of the land use coordination and transit priority measures endorsed by the City of Villages strategy.

It should be noted that with a CEQA impact significance analysis/determination even with a greater reduction of trips due to transit, walking, and bicycling, the determination would remain the same. It is expected that with subsequent, site specific design, transit improvement details, and further traffic modeling refinements this trip reduction would increase. To clarify the overall six percent, the following discussion has been added to the Final EIR discussion and staff conclusions:

- o Increase in Vehicle Occupancy from 1.1 to 1.35 persons/vehicle (23% carpooling increase).
- o Decrease in congested freeway miles from 77 miles to 29 miles (62% decrease).
- o More than double overall transit ridership from 1.8% to 4%.
- o Double peak hour home-work transit ridership from 6.6% to 15.9%.
- o Achieve 18.1% of all peak-hour home to work trips by walking, transit, and bicycling.
- o Significantly improve the accessibility to transit.

More Accurate Traffic Figures

Despite this dire forecast, the DEIR does not go far enough in its reporting; in fact, it is misleading in its assessment of North City freeway and community traffic degradation even under current growth:

A-11

To be especially blunt, it is time City planners stop promulgating certain transportation fallacies and correct them once and for all in the final EIR:

Background

Under "Existing Conditions" many reviewers will hear for the first time what community planners have known for several years: Worsening traffic capacity of our roadway system and inefficiency of our transit system by the late 1980s led to a 1990 decision by the City Council ("Growth Management Program") to lower acceptability standards for all roadways. "The standard level was downgraded from LOS C to LOS D." (IV-23) The acceptable "norm" for San Diego's roads now became "Approaching unstable flow. Tolerable average operating speeds with considerable sudden slowing. Freedom to maneuver and driving comfort is low due to density; the probability of accidents is increased."

A-12

Throughout the 1990's development proceeded despite documentation that the roads in specific communities could not handle this traffic.

Carmel Valley is one of those communities. The fallacy that needs to be addressed/corrected in the final EIR is that "improvements" in the State Route 56 - I-5 corridor will occur with current planning. Unfortunately, the DEIR perpetuates the notion that once the SR 56 middle segment (2 and 1/2 miles) is completed and connected to the west and east ends, traffic will flow on both freeways and not impact the communities they bisect.

The DEIR (IV-27 and elsewhere) asks the question: "Issue 3. Will the proposal result in an increase in projected traffic which is substantial in relation to the capacity of the street system?"

The document first cites two Carmel Valley-area I-5 segments as failed LOS F-- I-5 at Del Mar Heights Road and I-5 between Carmel Valley and I-805. Out of 5 I-5 sections that fail today, two affect our community daily.

A-13

To assess the impact of Issue 3, however, the DEIR repeats a fallacy this community would once and for all like to be excised: that "the completion of the middle section of SR-56 linking I-5 from Carmel Valley to Rancho Penasquitos" will raise the level of service in this transportation link. (IV-27)

"SANDAG's 2020 (RTP) (April 2000) estimates that there are 77 miles of a total of 616 directional-miles of freeways...within the region which are currently...operating at LOS F...With the following improvements, it is estimated that even with more people and more vehicles, the LOS F freeways and expressways in the year 2020 the deficient directional miles

STAFF RESPONSE A-11: Comment noted. It should be noted that the regional traffic impacts were based on SANDAG's 2020 Regional Transportation Plan. The distributed DEIR disclosed that with planned freeway improvements, the 77 miles of congested freeway would be reduced to 29 miles in the year 2020. With the projects potential addition of 17,000 to 37,000 attached homes and possible resultant 180,000 to 240,000 average daily vehicular trips, the traffic impacts were determined to be significant and unmitigated.

STAFF RESPONSE A-12: The City's 1990 decision to reduce the acceptable level of service (LOS) from LOS C to LOS D was addressed and disclosed in the Environmental Impact Report for 1990 Growth Management Program (DEP EIR No. 90-0526, dated September 18, 1990). This document was distributed for public review in July through August of 1990. As with all EIR's regarding citywide issues, copies of the Draft EIR were distributed to all community planning groups.

STAFF RESPONSE A-13: Refer to previous Staff Response A-11. The SANDAG's 2020 Regional Transportation Plan predicts no failed LOS F condition on the completed SR-56 in 2020. See Figure 3 of the distributed DEIR.

can be expected to be reduced to 29 miles...These needed improvements include...(HOV) lanes on I-5 and I-15; Completion of the idle section of SR 56 linking I-5 with I-15 from Carmel Valley to Rancho Penasquitos."

A-14 The SR 56 EIR concluded that this freeway through Carmel Valley and at I-5 would be at "LOS F", or, failed level of service upon its completion. I-5 widening studies and nearby development project environmental findings supported this finding. It is anticipated to operate at LOS F at I-5, and, in many analysis, from eastern approaches to this interchange. Further degrading this system: to date there are still no planned ramps from SR 56 west to north and from I-5 south-to-east, no funding for such ramps, and from all estimations, no imperative or cooperation from CalTrans to help fund such ramps. LOS F traffic will build up throughout Carmel Valley from east to west, forcing use of surface streets for I-5 access.

We only are aware of the SR 56 - I-5 scenario. Other freeway "improvements" listed as raising the level of service also need absolute scrutiny in order for residents and taxpayers to want to participate in a growth strategy that is presented as a more efficient and "neighborhood friendly" approach to growth.

A-15 The final EIR cannot be certified with the erroneous information that the unmitigated impacts of the "City of Villages" traffic increases may be improved with the completion of SR 56.

A-16 The level of detail for a future "village" is left to an MEIR and project-specific environmental review. In our view this review level should more accurately assess current traffic. It should show not only how the "improvements" labeled as partial solutions will not improve freeways, but also how this backed up traffic will continue to degrade surface roads within communities, often at the heart of the communities where potential "villages" are envisioned. It should assess how Carmel Valley with no planned mass transit can add more housing.

DEIR Assessment of Impacts

A-17 The DEIR is to be commended for reporting the degradation of traffic congestion in San Diego in the past 20 years. "During the 1990s while the population in the San Diego region increased 12.6%, the weekday vehicle miles of travel (VMT) increased... 18.7%...nearly one and one-half as high as the population increase...By 2020, the daily VMT is expected to increase by another one-third." (IV-22)

To fully grasp our transportation future and the role "City of Villages" growth planning could have on it, two additional avenues of information should be provided:

1. Does this figure include commercial traffic (especially trucks)? The SANDAG 2020 EIR stated that some 30% of the traffic growth in the region in this time period was due to commercial traffic.

STAFF RESPONSE A-14: Comments noted. It should be clarified that the SR56 Final EIR (LDR No. 95-0099; dated April, 1998) did disclose that "these ramps were included in the SANDAG regional traffic forecasting and were assumed to be in place for all traffic scenarios after the year 2010. They would be funded through the STIP process." The 1998-2004 Regional Transportation Improvement Program (August, 1998) lists the construction of SR56 northern connectors at I-5 as fifth of nine high priority project authorization for the San Diego Region. The current COV/SFE EIR addresses traffic on a regional basis and discloses that the current 77 miles of congested freeways would be reduced to 29 miles with planned improvements in 2020. These improvements listed in the distributed DEIR, include high-occupancy vehicle (HOV) lanes added to both I-5 and I-15. The SANDAG's 2020 Regional Transportation Plan, the basis for the DEIR analysis, predicts no failed (LOS F) condition on the completed SR-56 in 2020. See Figure 3 of the distributed EIR.

STAFF RESPONSE A-15: The significance determination in the distributed DEIR analysis was based on the project's expected incremental contribution to the regional freeway system which is expected to include, at best, 29 miles of congestion segments in the year 2020. While this significant and unmitigated traffic congestion condition would exist with or without the proposed project and the project's incremental contribution is relatively numerically small (see Table B-3), nevertheless, pursuant to standard CEQA analysis, the project can be expected to contribute to this significant traffic congestion. This is a significant and unmitigated impact.

The DEIR analysis was based on the SANDAG's 2020 Regional Transportation Plan (RTP); this plan predicted that the current 77 miles of congested freeways regionwide can be reduced to 29 miles with planned improvements. These planned RTP improvements were listed in the distributed EIR. The RTP predicts no failed LOS F condition on the completed SR-56 in 2020. See Figure 3 of the distributed DEIR. Also refer to previous Staff Response A-11.

STAFF RESPONSE A-16: Comments noted. It should be noted that MTDB proposed Transit First Network shows a yellow car route along SR-56 and another east-west route, a red car route, connecting I-15 with I-5 and serving Carmel Valley, Pacific Highlands Ranch, Torrey Highlands, Black Mountain Ranch, 4-S Ranch (within the County), and Rancho Bernardo. Also see previous Staff Response A-3 (Paragraph 1).

STAFF RESPONSE A-17: Comments noted. The regional traffic model always accounts for commercial truck traffic. An additional traffic model was conducted to consider employment opportunities mostly within the potential subregional districts and urban villages with refined transit improvements. This result showed that overall transit walking mode split of six percent reported in the distributed DEIR should be revised to 9% to 10% transit, walking, and bicycling trips of total trips. Even with this increase, the regional traffic impacts remain significant and unmitigated.

A-18

2. Realistically, if only 6% decrease in automobile ridership is anticipated with all travel trips even with improved transit and pedestrian-oriented "village" centers—i.e., "Transit First" adoption—how much worse will the current most failed roadways become (extending LOS F even beyond peak a.m. and p.m. times, for example)? What new roadways will degrade into LOS F and at what times?

A-19

Although the DEIR is presented as "programmatic" it seems unrealistic to us to try to get City Council approval (read: the "public's approval") on a growth proposal without at least a basic attempt to assess transportation problems with this growth beyond stating that "the project's traffic impact is significant."

We concur that the funding of "trolleys on wheels" with uninterrupted paths constructed to make transit more efficient is a proven improvement over today's transit system. We laud Allen Hoffman's system of green, red, and yellow car routes to get commuters to the long-haul system in the first place.

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III Environmental and Open Space Issues

A-20

The "Proposed Project Description" (Attachments) contains the "City of Villages" primary elements, including "Urban Form and the Environment" and "Conservation." Statements such as "Subsequent new development/redevelopment will respect the City's natural features and open spaces, unfortunately do not get repeated enough in the DEIR.

We propose two changes that will strengthen the document's compliance with the City's and many community's environmental policies, as well as those of other relevant land use plans ("San Dieguito River Valley Concept Plan, etc.):

A-21

Under "Hillsides and Sensitive Lands" (IV-4), delete the "minimize" in: "2. Minimize or eliminate development impacts on rare, threatened, endangered, or candidate species", changing this passage to: "Eliminate development impacts on rare, threatened, endangered, or candidate species."

Additionally, where proper emphasis is placed on adherence with the Multiple Habitat Conservation Plan, wherever a discussion on this occurs in the final

STAFF RESPONSE A-18: Refer to previous Staff Response A-10. When each community plan is updated or amended to accommodate the City of Villages strategy, the accompanying environmental review would be required to analyze any traffic impact on local roads. It is expected that with specific village/corridor locations and/or site design and with transit improvement details, community level traffic modeling would reduce if not mitigate significant localized, traffic impacts.

STAFF RESPONSE A-19: Refer to previous Staff Response A-15.

STAFF RESPONSE A-20: Comments duly noted. The EIR focuses on impact analysis pursuant to CEQA, the adverse effects of the project, the proposed strategy to guide future growth and development. The environmental goals and policies of the existing community plans would be consistent with the new strategy and would not be required to be changed with the adoption of the new strategy. The commenter's cited statements included in distributed EIR's project description (p. III-6) is a relatively positive feature of the proposal and would not adversely effect the environment. It may be more applicable to growth allowed by existing plan and zone outside the potential villages and transit corridors. It should be noted that generally the potential villages (and corridors) were identified and revised to avoid natural features and open spaces as well as resources associated with open spaces. For instance, there are no potential areas for possible, future land use intensifications in the City's planned preserve, the Multi-Habitat Planning Area (MHPA), or in designated open space areas, and most areas are existing developed areas identified for potential, future infill/redevelopment. Since there are no anticipated adverse effects, biological resources were determined in the distributed DEIR, to be one "effect found not to be significant" (Chapter VII).

STAFF RESPONSE A-21: The commenter's suggestion of deleting the word "minimize" can not be done because the City through the adoption of the Multiple Species Conservation Plan (MSCP) and the implementing MSCP Subarea Plan received "take" authorization for 85 "covered" species from the wildlife agencies. These covered species include rare, threatened, endangered, and candidate species, collectively named "sensitive" species. The "take" is an allowed, limited amount of loss of these sensitive species with the understanding that ultimately the assembling of the Multi-Habitat Planning Area (MHPA) in the City as well as planned preserves within the southwestern portion of the County, would conserve these 85 sensitive species and their habitat. It should be noted that CEQA mitigation process first considers avoidance (elimination) of significant impacts and then considers reduction or minimization combined with mitigation. In an EIR, avoidance is also considered in the required No Project Alternative.

Suggested adherence to the adopted MSCP with its implementing subarea plan is a assumed existing and future condition. The proposed City of Villages strategy proposes or requires no changes to the MSCP subarea plan, the MHPA, Environmentally Sensitive Lands (ESL) Ordinance, or the biological guidelines; therefore, there is no need to discuss any adverse effects. Also refer to previous Staff Response A-20.

EIR adherence to the Progress Guide and General Plan "Other Community Open Space" should be included. This should occur on IV-20 under discussion of impacts. For example, under "Issue 1: Will the proposal result in a conflict with the environmental goals, objectives and recommendations of the (PG & GP)?" and, especially, Issue 3: "Will the proposal result in a land use which is inconsistent with adopted community plan land use designations or incompatibility with adjacent land uses?"

A-22 During the 1997 City Council hearings on the MSCP, the amendments to the Progress Guide and General Plan were approved by the environmental community and many community planning boards only on the condition that certain open space specific to communities continue to be protected as "Other Community Open Space." Therefore, the two primary categories of "Open Space" in the amended *Progress Guide and General Plan* are "MSCP Open Space" and "Other Community Open Space."

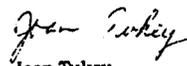
Many current City policy documents refer only to adherence to "MSCP Open Space" and ignore the equally relevant "Other Community Open Space."

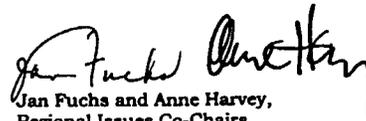
A-23 The final EIR for the "City of Villages - Strategic Framework Element", of all documents, should highlight "Other Community Open Space", since the precepts of "villages" in this proposal underscore the integrity of communities.

The final EIR should quote directly from the PG & GP:

A-24 "This category includes areas that have been designated for long-term open space use primarily because of their value in protecting landforms; providing buffers within and between communities or potentially incompatible land uses; providing visually appealing open spaces; and protecting habitat and biological systems of community importance that are not otherwise included in the (MSCP) Open Space category. Most of this open space has been designated in adopted land use plans for many years..."

Thank you for the opportunity to comment on these documents.


Joan Tukey,
Chair


Jan Fuchs and Anne Harvey,
Regional Issues Co-Chairs

STAFF RESPONSE A-22: Comments noted. The distributed EIR focused on small urban canyons which have long been bounded by development and which were credited as MHPA acreage within the urbanized core. The EIR disclosed that these canyons were receptacles for storm drains and that some contained aging sewer pipelines which needs to be accessed for maintenance and/or replaced. The DEIR suggested the potential enhancement of these canyons for in-situ, pipeline construction/access mitigation, passive water control, greenbelt, and passive recreational opportunities (i.e. trails).

It should be noted that outside the older, urbanized core and in relatively newer areas such as Carmel Valley and the former Future Urbanizing Area, large tracts of land were planned and/or developed at one time. In these areas, the MHPA was comprised of large, connected areas of higher habitat value, placed into open space at the time of development approval. Generally, the cited other open space in these areas are smaller and/or narrower, isolated easements within the developed portion of these large projects.

STAFF RESPONSE A-23: Comment noted. Also refer to previous Staff Response A-20.

STAFF RESPONSE A-24: Comment noted.

The distributed DEIR discusses how the adopted Environmentally Sensitive Lands Ordinance and the MHPA regulate and protect open space. The final EIR will also include a description of the open space zones and their purpose, that is, "to protect lands for outdoor recreation, education, and scenic and visual enjoyment; to control urban form and design; and to facilitate the preservation of environmentally sensitive lands. It is intended that these zones be applied to lands where the primary uses are parks or open space or to private land where development must be limited to implement open space policies of adopted land use plans or applicable federal and state regulations and to protect the public health, safety, and welfare."

Although the City's Land Development Code includes open space legislation, the draft Strategic Framework Element recognizes the many values of open space in addition to habitat preservation, and recommends that existing regulations be examined to determine how well they implement policy direction to protect all designated open space, including urban canyons and urban forest resources.

The open space zones which were adopted with the Land Development Code, once examined for effectiveness and where appropriate, they can be placed on the commenter's cited "Other Community Open Space" as community plans are updated or amended.

The commenter's cited language regarding community open space has been added as Goal 21 to the existing environmental goals and policies of the Progress Guide and General Plan, in the land use discussion of the Final EIR (Chapter IV).

CLAIREMONT - MESA



PLANNING

COMMITTEE

March 26, 2002

CITY OF SAN DIEGO

MAR 29 2002

PLANNING DEPARTMENT

Mr. Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Department
CITY OF SAN DIEGO
1222 First Avenue, M.S. 501
San Diego, CA 92101

Subject: The City of Villages Growth Strategy and Strategy Framework Element DEIR
(LDR No. 40-1027/SCH No. 2001061069)

Dear Mr. Monserrate:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the City of Villages Growth Strategy and Strategic Framework Element. Comments on the environmental process and the Draft EIR follow.

PREFACE

B-1

The following comments are not intended as a critique of the Strategic Framework Element or the City of Villages. The comments are provided solely for the purpose of ensuring that the EIR provides the public and the decision makers with the necessary information to understand the environmental impacts of the proposed project, particularly those related to the human element and our standard of living. The comments are also intended to ensure that the EIR comply with the California Environmental Quality Act and the City's own guidelines on preparing Environmental Impact Reports.

DISCREPANCY BETWEEN THE NOP/SCOPING LETTER AND THE DRAFT EIR

B-2

On June 12, 2001, the City issued a Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Strategic Framework Element of the City's Progress Guide and General Plan. Attached to the NOP was an interdepartmental memorandum dated June 4, 2001 which provided a detailed discussion of the issues that were to be addressed in the Draft EIR. Section I (Introduction) of the Draft EIR on page I-11 reiterates that "the issues the City found to be potentially significant were identified in the Scope of Work attached to the

4975 Milton Street, San Diego, California 92110

STAFF RESPONSE B-1: Comments noted. The distributed DEIR as it relates to the subject regional scope of the proposed project, proposed strategy to guide future growth and development without any land use change, has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization.

STAFF RESPONSE B-2: The purpose the distributed Notice of Preparation (NOP) is to allow for meaningful to the decision to prepare an EIR and to solicit response to the scope of the forthcoming DEIR and (pursuant to Section 15083 of the CEQA Guidelines) and to resolve any potential problems at an early stage; this section also authorizes/encourages the lead agency (the City) to early consultation; however, this is not required. In addition, the city held a meeting regarding the scope of the DEIR and to discuss the CEQA process.

The scoping memorandum which was attached to distributed NOP was for CEQA environmental review of a proposal which would accommodate 45,000 to 70,000 additional attached homes. The NOP also included the initial draft City of Villages map. Since its distribution in June 2001 and the preparation of the Draft EIR in January 2002, there has been a reduction in the estimated range of potential additional units from 45,000 to 70,000 to 17,000 to 37,000. This reduction in the proposed project was based on a new, preliminarily regional forecast for the year 2030, which showed less additional population for 2020. In addition, the potential villages and transit corridors were reduced on a revised COV map. This revised COV map was included in the distributed DEIR.

Another important factor in the preliminary review of probable environmental issues in the attached scoping memorandum (NOP) in comparison to the environmental analysis in the distributed DEIR, is the refinement of the project description of the proposed strategy to guide future growth and development. The important refinement is that the project did not propose any land use designation changes; these future changes would occur with subsequent community plan updates and/or amendments. This process was described in the "Uses of the EIR" section (P. I-13). A further clarifying sentence would be added to this EIR section. This proposed project refinement along with the reduced units and the revised map reduced the scope of the analysis in the distributed DEIR. This is especially true for issues more related to actual site-specific development or community-level analysis such as neighborhood character.

The scoping memorandum contained "potential environmental effects" or "probable environmental effects" (issues) pursuant to CEQA Guidelines Section 15082 and issue questions (pursuant to City's Initial Study Checklist) to be considered in the Draft EIR. Environmental issues identified in the scoping memorandum were addressed in the distributed DEIR. However, due primarily to the reduction in the estimated number and the range of additional attached homes, some issue questions were determined to be no longer applicable to the reduced project. In addition, the reduced number of potential villages and corridors depicted on the revised COV map also determined the required analysis.

According to CEQA Guidelines (Appendix G) there are sixteen possible environmental issues, and there are issue questions which direct the analysis of the environmental issues. For instance, the City has significance criteria for fifteen environmental issues; two issues, facilities and public services, have sub-issues. It is incorrect to assert that each clarifying issue question is a separate environmental issue. The distributed DEIR addressed fourteen separate environmental issues in detail.

It should be noted that the completed EIR's listed in the annotated list of the Cumulative Impacts (Chapter VI) show that three-quarters of the EIR's considered less than ten environmental issues; one-quarter were focused documents and considered four or fewer issues. Only two of 128 EIR's listed contained more than fourteen issues. The distributed DEIR contained a comprehensive environmental review of the City of Villages strategy.

distributed Notice of Preparation." Unfortunately, only 31 of the 54 issues identified in the NOP/Scoping Letter are discussed in the Draft EIR and several are inadequately evaluated in the Draft EIR as summarized on the following table and as discussed below. Therefore, the public was misled as to what the Draft EIR would address. Had the NOP identified only those issues that were actually addressed in the Draft EIR, the Clairemont-Mesa Planning Committee, and most likely many other agencies, organizations, and individuals, would have responded to the NOP.

DISCREPANCY BETWEEN THE ISSUES IDENTIFIED IN THE NOP/SCOPING LETTER AND THE ISSUES ADDRESSED IN THE DRAFT EIR BY ISSUE CATEGORY

Issue Category	Number of Issues	
	NOP	DEIR
Land Use	5	4
Neighborhood Character / Aesthetics	5	1*
Public Services	5	3 ^b
Utilities	6	5
Transportation / Circulation	6	3
Water Quality	4	3
Hydrology	3	0
Air Quality	2	2
Biology	6	1 ^c
Noise	3	2
Geologic Hazards	2	2
Cultural Resources	3	3
Paleontological Resources	1	1
Human Health / Public Safety	2	1
Total	54	31

B-3

STAFF RESPONSE B-3: See previous Staff Response B-2. It should be noted that the hydrology was a probable issue disclosed in the NOP/Scoping memorandum; however through a critical review of the proponent's proposal, it was determined that there are no potential village site which would be possibly located within a 100-year floodplain. The one exception is the Levi-Cushman site in Mission Valley. This current golf course site has an adopted specific plan, and its vested development includes the condition that it provides a 100-year flood control channel. This was disclosed in the distributed DEIR (P. IV-6). This requirement for flood control would be required for any future development including one which may subsequently implement the proposed City of Villages strategy.

The commenter's issues explained by footnotes, neighborhood character and biology, were included, as indicated, in the "Effects Found Not to be Significant" (Chapter VII) section of the distributed DEIR. The previously described proposed project refinement that there would be no resultant, direct land use intensity changes (Staff Response B-2) reduced the scope of the analysis in the distributed DEIR; this is especially true for issues more related to actual site-specific development or community-level analysis such as neighborhood character. In addition, in determining that there would be no significant effect, analysis including field checks were conducted to assure that single family neighborhoods would not be affected. As stated in the distributed DEIR, the proposed City of Villages strategy would generally affect long-established, developed areas and would not result in significant adverse effect on areas of sensitive biological resources. This determination was based on review of citywide Multiple Species Conservation Program (MSCP) biological resources maps and Multi-Habitat Planning Area (MHPA) maps, compared to the draft COV map.

STAFF RESPONSE B-4: Refer to previous Staff Responses B-2 and B-3.

B-4 According to Attachment A, 26 letters were received in response to the Notice of Preparation. To the extent that they addressed relevant CEQA issues, were these comments reflected in the Draft EIR? As noted on page 9 of this letter in the discussion under Neighborhood Character/

* The discussion of Neighborhood Character and Aesthetics is relegated to one paragraph within the section entitled "Effects Found Not to be Significant."

^b The discussion of School Facilities and Fire/Police Protection are relegated to one paragraph each within the section entitled "Effects Found Not to be Significant."

^c The discussion of Biological Resources is relegated to one paragraph within the section entitled "Effects Found Not to be Significant."

Aesthetics, it is apparent that the response from the Southeastern Economic Development Corporation was not reflected.

INADEQUACIES OF THE DRAFT EIR

GENERAL COMMENTS

- B-5
- As stated above, the Draft EIR fails to address many of the potentially significant issues that were identified in the NOP/Scoping Letter.
 - A City of Villages Map, which is attached as Figure 2, shows the location of the proposed/assumed Regional Center, Subregional Districts, Urban and Neighborhood Villages Centers and Transit Corridors. Therefore, the Draft EIR should evaluate the impacts related to these specific locations consistently throughout the EIR. Unfortunately, with the possible exception of Historical Resources, the Draft EIR does not achieve the necessary level of detail for most of the issues.

INTRODUCTION

- Page I-3 – The second paragraph states the following:

“The proposed City of Villages strategy would result in more things to walk to since retail commercial, employment centers, and public gathering places would be located in attractive mixed-use village centers which are either close enough to access by walking or biking or are easily reached by transit. Most people would still own an automobile and some households may still find it necessary to have multiple cars. However, people would no longer have to use their personal vehicles for every trip they make and many households may find that they would not need to own multiple cars; expanded/improved transit would become their auxiliary vehicle.”

B-6

The above statement from the Draft EIR suggests that all residents within the community will now be able to walk to shops and transit stops, and therefore will be less dependent upon the automobile. That is clearly not true. Page 63 of the Strategic Framework Element Draft (January 2002) more accurately states that “the common features of all the villages will be the ease of walking between residential units, transit stops, and basic commercial uses.” In other words, it’s the new residents who benefit from the location. And this is a good thing. But the Draft EIR should not overstate the case.

- Page I-3 – The fourth paragraph states the following:

“The envisioned improved transit services is expected to result in significant gains. The expanded/improved “world class” transit would become a realistic transportation choice for the majority of the region’s residents.”

B-7

Has the Metropolitan Transit Development Board approved the referenced transit improvements, and has the Board obtained the necessary funding to implement the improved transit services?

What does “world class” mean? This is a subjective “buzz” term that should not be used in an EIR if the document is to be considered objective.

- Page I-11 – The first paragraph states:

STAFF RESPONSE B-5: The purpose of this EIR is to analyze the adverse environmental impacts of the proposed project which is the adoption of policies to guide future growth and development, not the citywide distribution of housing units or population. Although the distributed DEIR identified potential areas for urban villages and transit corridors on the Strategic Framework Element/City of Villages Map (4th Draft) located in the Element on and referred to in Figure 2 of the distributed DEIR, the map does not constitute a land use map. The village locations on the map merely provided a technical basis for the assumptions needed for input into the regional transportation model and for analysis of impacts and do not mandate specific densities or village locations. Subsequent community plan amendments, master plans, rezones will be required to actually change the land use required to construct individual villages in the future. The sum of these actions will ultimately determine the planned distribution of any population/housing growth that may occur. These actions will require future environmental review and analysis that more specifically identifies impacts and/or mitigation; this process of tiering subsequent environmental review with phased implementation which require future discretionary actions, is consistent with CEQA Guidelines Sections 15152(c) and 15168 (c)(1).

CEQA guidelines (Sections 15064.5) specify determining significance of impacts on historical and unique archaeological resources; this direction is unique to these resources. Unlike other environmental issues, CEQA establishes rules for analysis of these specific resources, to determine substantial adverse effects. This requires more site-specific detail than for other indirect, potentially significant impacts. The distributed DEIR listed specific historical and archaeological sites which may be affected by the subsequent potential siting of villages. While this proposed strategy to guide future growth and development may not directly result in development which may directly affect these resources; nonetheless, the cited historic resources are those listed by the City’s Historic Resources Board and must be considered significant resources. For the disclosed “suspected” village site, this site has been recorded. While the extent may not be exactly known, such a potential, subsurface recorded resource must also be considered significant (Section 15065). Any action such as this proposed strategy which may result in possible subsequent land use intensification which in turn, may engender development on or adjacent to known significant resources, must be considered potentially significant.

STAFF RESPONSE B-6: Successful implementation of the City of Villages and Transit First strategies would result in more transit use and walking for existing community residents as well as new village residents. The Transit First network has been designed to serve existing activity centers, as well as new compact growth. This is essential, as housing within City of Villages areas only represents about 5 percent of the total number of housing units expected to be in the City of San Diego by 2020. A goal of the transit plan is to make transit so appealing that it becomes the first choice of travel for many trips.

Increased walkability is another expressed citywide goal of the proposed City of Villages strategy, to be achieved through more street trees, street connectivity, pedestrian lighting, walkable neighborhood destinations, street retrofits, and other factors. This goal is reflected in numerous statements throughout the Element from the “Core Values” section to Urban Form, Neighborhood Quality, and Mobility policy recommendations. In addition, the transit and pedestrian mode splits reported in the distributed DEIR apply to the entire City: transit mode splits for village residents with access to Trolley, or train-like transit service (MTDB’s Red or Yellow Car network) would likely be higher. A study of transit-oriented development near rail stations in San Francisco Bay areas cities found that developments near transit have a significantly higher share of trips made by transit (on average, five times more likely to use transit) than the regional average.

The distributed DEIR did not “overstate” the benefits of future villages with improved transit and enhanced walkability. While these features partially reduce impacts, significant impacts to air quality and traffic were determined to be unmitigated.

STAFF RESPONSE B-7: The Metropolitan Transit Development Board (MTDB) approved the Transit First vision on October 26, 2000, followed by approval of an overall implementation plan on November 9, 2000. One of the key elements of the implementation plan is to work with SANDAG to identify funding to implement the Transit First vision. An important step to obtain funding is to include the Transit First network of projects in the 2030 Regional Transportation Plan (RTP). This has been prepared as a draft Regional Transit Vision. The 2030 RTP, which will incorporate the Regional Transit Vision, will likely form the basis for developing the program of projects for a TransNet reauthorization measure.

In addition, MTDB is pursuing the development of Showcase projects (pilot transit projects) designed to illustrate the full Transit First experience in selected locations over the next 3-5 years. Funding for the implementation of Showcase projects, as well as the entire Transit First network, will necessarily come from a variety of local, state, and federal sources. As funding is secured, improvements will be phased in over time. The rate of implementation will depend upon the willingness of San Diego taxpayers to fund the program, the availability of state and federal funds, the success of transit/land use integration efforts, walkable community design improvements, and implementation of transit priority measures.

Webster’s II New College Dictionary defines “world-class” as “ranking among the best in the world: of an international standard of excellence.” This definition is consistent with the meaning conveyed in the distributed DEIR.

"This EIR evaluates the potentially significant environmental issues as determined by the City of San Diego during the Initial Study process. . . . The City found that due to the proposed project there may be potentially significant effects related to: land use, transportation/circulation, neighborhood character and aesthetics, air quality, public services, utilities, water quality, hydrology, noise, geologic hazards, human health and safety, paleontological resources and historical resources."

The second paragraph states:

B-8

"For each issue, the EIR contains a discussion of existing conditions, potential impacts, an analysis of significance of the impact and proposed mitigation measures for those impacts identified as significant."

The second sentence of the fourth paragraph states:

"The issues the City found to be potentially significant were identified in the Scope of Work attached to the distributed Notice of Preparation."

Unfortunately, the EIR does not address many of the issues that are presented in the Scope of Work. Nor are all of the issues discussed at the same level of detail.

Page I-12 - The first sentence of the second paragraph states that "this document is a Draft Programmatic (emphasis added) EIR . . ."

Does the City mean "program" EIR? State CEQA Guidelines Section 15168 (a) states the following regarding a Program EIR:

B-9

"A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

1. Geographically,
2. As logical parts in the chain of contemplated actions,
3. In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

B-10

What are the series of actions that are addressed in this Draft EIR? Other than the initial actions related to the adoption of the Strategic Framework Element, the Action Plan, and the application of the Transit-Oriented Development (TOD) guidelines, what subsequent actions would the Draft EIR be used for? Presumably all subsequent actions are addressed in the Action Plan.

ENVIRONMENTAL SETTING

B-11

Pages II-1 - II-4 - Since a primary goal of the Strategic Framework Element is to satisfy the projected need for 17,000 homes above the yield of current community plans, it is imperative that the Draft EIR identify the current capacity of each community plan and the City as a whole. This could best be accomplished by a table which lists the community planning area, its capacity in terms of dwelling units, and its capacity in terms of population. It is essential to establish this benchmark against which the proposed project can be compared.

STAFF RESPONSE B-8: Refer to previous Staff Responses B-2 and B-3.

STAFF RESPONSE B-9: The most applicable label for this EIR addressing the proposed strategy to guide future growth and development, is the commenter's cited "program level" EIR. However, regarding the cited CEQA Section 15168 (a), only the first two characteristics apply to this subject EIR. Geographically, this EIR addresses a proposed General Plan, citywide policy, a strategy to guide future growth and development. This first-tiered EIR addresses the initial phase for the adoption of the proposed strategy; as disclosed in the distributed DEIR, the implementation would require future community plan amendments/updates with subsequent, tiered CEQA review. The other cited characteristics do not apply. This proposed project, the strategy, would not result in any land use change, and this EIR would not adequately cover any subsequent discretionary project implementing the City of Villages strategy. See previous Staff Response B-2 (Paragraph 2).

STAFF RESPONSE B-10: The use of this EIR for any subsequent actions related to the proposed Strategic Framework Element and Action Plan, will be determined on a case-by-case basis. It is anticipated this first-tiered, program level EIR could be utilized to describe some citywide and cumulative impacts of future actions on a case-specific basis; this EIR ensured consideration of cumulative impacts that might be slighted in subsequent environmental document for future, implementing action or site-specific village development. The subsequent, implementing actions described in the Action Plan would require future CEQA environmental review prior to their adoption.

STAFF RESPONSE B-11: The need for additional homes to meet the forecasted demand is more accurately portrayed as the catalyst to begin the process of updating the current Progress Guide and General Plan with the proposed strategy to guide future growth and development; however, it is simplistic to cite the future housing need alone. Another major factor is the disappearing raw land available for development. In addition, the proposed strategy envisions a more compact, future redevelopment/infill of mixed use villages and transit corridors with enhanced walkability and sense of community through design and amenities and concurrent improved public transit. As stated in the distributed DEIR, this first-tiered, program level document addresses impacts of the proposed strategy on a regional/citywide basis. This level of analysis is adequate for a proposed General Plan policy which would not result in any land use change. The baseline used in this analysis is citywide.

It is also important to describe how the carrying capacity of the community plan was established. Is the carrying capacity based on a number that appears in each community plan? Is it based on the build out of residentially designated or zoned land?

PROJECT DESCRIPTION

- B-12
- Page III-1 – The last sentence of the first paragraph states that “the proposed Strategic Framework Element provides a long-term strategy for accommodating the City’s forecasted population growth and development needs, predominately through effective and innovative redevelopment infill.”

Exactly what is meant by “effective” and “innovative”? Are these more “buzz” words?

- Page III-1 – The last complete sentence on the page states the following:
“Efficient improved and/or expanded transit service is an essential component of the proposed village design.”

- B-13
- What are the specific recommendations related to providing “efficient improved and/or expanded transit service?” If there are such recommendations, why are they not discussed in the project description?

- Page III-2 – The second complete sentence states the following:
“A full range of public facilities would be required as well for each community in which a village center is envisioned.”

- B-14
- By what means will these public facilities be required?

- Page III-2 – The sentence beginning on line 7 states the following:
“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.”

First, how does the EIR define “quality of life?”

- B-15
- Second, Mr. Robert Green in his letter of June 12, 2001, in response to the Notice of Preparation, correctly stated the following:

“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 what the impacts would be.”

It is certainly appropriate for the Project Description to identify the maintenance of “quality of life” (whatever that is intended to mean) as an objective of the project, but not to make a conclusory statement that it will accomplish this objective.

- Page III-2 – The last sentence of the first complete paragraph states the following:

“The designation of villages and adoption of more detailed plans for districts, centers and corridors would occur through subsequent community plan updates, and amendments which would require separate CEQA review.”

STAFF RESPONSE B-12: These cited words were used in the project description of the distributed DEIR, as adjectives in common usage as defined in a dictionary. Merriam Webster defines “effective” as “producing or capable of producing a result” and defines “innovative” as “characterized by, tending to, or introducing innovations (new ideas, methods, or devices).” In other words, the proposed Strategic Framework Element provides a new long-term strategy for accommodating the City’s forecasted population growth and development needs, predominantly through comprehensively planned redevelopment/infill that is capable of producing desired results.

STAFF RESPONSE B-13: Refer to previous Staff Responses B-6 and B-7. The improved and expanded transit service is described in the background section of the distributed DEIR (pp. I-2 through I-5). Transit First is a concurrent but separate planning effort by the Metropolitan Transit Development Board (MTDB) with assistance from SANDAG. It is a separate project proposed by MTDB who can act as a CEQA lead agency.

STAFF RESPONSE B-14: A framework for providing the needed facilities will occur through an update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

STAFF RESPONSE B-15: The distributed DEIR disclosed and analyzed impacts associated with adoption of the proposed Strategic Framework Element. The proposed Element would provide guidance to meet housing and employment needs and to preserve and enhance San Diego’s neighborhoods. Although initiated in part as a response to projected population increases, the element describes how, regardless of the rate of growth, the City of Villages strategy can maintain and enhance the City’s quality of life. The City of Villages strategy is based upon nineteen core values identified by the San Diego public. They are as follows:

Our Physical Environment - We Value:
The natural environment.

The City’s extraordinary setting, defined by its open spaces, natural habitat and unique topography.
A future that meets today’s needs without compromising the ability of future generations to meet their needs.
The conservation, preservation, and environmental quality of natural resources.
Parks and public spaces, accessible by foot, transit, bicycle, and car, as areas for neighborhood, community and regional interaction and convenient recreation.
The availability of public facilities, infrastructure, transit, information infrastructure, and services as essential to neighborhood quality and as necessary companions to density increases.
A compact, efficient, and environmentally sensitive pattern of development.
Walkable communities with tree-lined streets.
A convenient, efficient, aesthetically pleasing, and multi-modal transportation system.

Our Economy - We value:

The health, economic prosperity, and well being of our citizens.
A diverse economy to achieve a rising standard of living for all San Diegans.
Mutually beneficial cultural and economic ties with Mexico and our neighbors in Latin America.
Regional cooperation and coordination to resolve regional growth issues and regional collaboration to meet economic prosperity goals.

Our Culture and Society - We value:

Social equity.
Safe and secure neighborhoods.
The physical, social and cultural diversity of our City and its neighborhood s.
Affordable housing, which is more widely distributed and an overall diversity of housing types and costs.
Schools as an integral part of our neighborhoods and equitable access to quality educational institutions.
The City’s multiplicity of arts, cultural, and historical assets.

These core values will provide the foundation for future policy decisions and implementation actions. Following the strategy outlined in the Strategic Framework Element would enable communities to locate growth to maintain, and even improve, the quality of life throughout the City.

The proposed Five-Year Action plan calls for annual monitoring to measure progress made towards implementation of the proposed City of Villages strategy. The monitoring plan includes measuring progress toward attaining relevant “sustainable community program indicators”. These includes indicators developed to measure the long-term health and sustainability of the region.

This is consistent with the following responses to queries of September 2001 and January 2002 to the Planning Department:

B-16

"... it is extremely important to note that the numbers... identified are VERY preliminary, continue to evolve, and are for purpose of analysis in the EIR. They are based upon very broad assumptions applied on a city wide basis... Once the EIR is complete, we (Planning Department) plan to develop a range of housing unit targets by community that would be used as a guide for future community plan updates along with proposed public facilities improvements. The actual increased number of housing units per site would be decided following updates/amendments to the community plan, rezoning of specific sites, and with a specific development proposal." (E-mail, Colleen Clementson, Program Manager, September 18, 2001)

"... we (Planning Department) took a much more general approach in the latest mapping effort that is community-wide as opposed to site by site since our analysis in the EIR is being done on a city wide basis." (E-mail, Colleen Clementson, Program Manager, January 14, 2002)

However, as discussed below, these assumptions must be spelled out in sufficient detail for purposes of the environmental review.

B-17

Page III-5 – As stated above, Figure 2 shows the location of the proposed/assumed Regional Center, Subregional Districts, Urban and Neighborhood Villages Centers and Transit Corridors. However, neither the Project Description nor the other documents provided with the Draft EIR provide any discussion of the acreage of the proposed/assumed Districts, Centers or Corridors, the number of dwelling units that would be accommodated in each, or the anticipated population that would result from the increase in dwelling units. Failure to reveal this information makes it impossible to determine the distribution of the increased number of dwelling units and population. How the increased number of dwelling units and populations are proposed/assumed to be distributed throughout the City is critical in analyzing the environmental issues and determining mitigation measures.

B-18

Are some communities assumed to receive a disproportionate number of increased dwelling units and, therefore, a disproportionate impact in terms of facilities, services, and infrastructure? The Clairemont Mesa Planning Committee was told that the current City of Villages Map assumes 821 to 1,283 additional dwelling units in Clairemont Mesa (e-mail, Colleen Clementson, Program Manager, January 14, 2002). What about the other community planning areas?

The EIR should provide a table that includes the following assumptions:

1. the acreage of the Districts, Centers or Corridors as designated on Figure 2;
2. the number of dwelling units that would be accommodated in each; and
3. the anticipated population that would result from the increase in dwelling units.

There should also be a summary table showing by community planning area the following:

B-19

1. the existing number of dwelling units and population;
2. the current capacity of dwelling units and population (as established in the Environmental Setting);
3. the proposed increase in the number of dwelling units and population; and
4. the total number of projected dwelling units and population.

STAFF RESPONSE B-16: The cited "range of housing unit targets" by community plan has been added to the proposed Action Plan. These targets or goals do not establish any set number of additional units which may be placed in each community; the purpose would be used to track the implementation of the proposed City of Villages strategy, and the targets or goals can be used to further refine the cumulative effects in subsequent CEQA review.

The analysis in this first-tier, program level EIR is based on a citywide projection of additional housing units necessary to accommodate the proposed City of Villages strategy through year 2020. Specific locations for new housing beyond those provided for in existing community plans will be determined during subsequent updates and/or amendments to individual community plans and will be analyzed in the subsequent, second-tiered environmental documents for those plan updates and/or amendments.

STAFF RESPONSE B-17: It is not correct to simply state that Figure 2 of the distributed DEIR, shows the location of proposed/assumed centers, district, villages, and corridors without the caveat that the proposed strategy would not result in any land use change, and this EIR would not adequately cover any subsequent discretionary project including future centers, district, villages, and corridors. Also refer to previous Staff Response B-5 (Paragraph 1).

STAFF RESPONSE B-18: To monitor the progress of the implementation of the City of Villages strategy relative to forecasted growth on a citywide basis, the Action Plan contains an Implementation Monitoring Plan that sets housing goals by community plan area. However, no specific community is mandated to receive a specific planned number or acreage of villages, residential units, or population. Any increase or addition of attached units will be addressed when future community plan updates or amendments are adopted which would be subject to separate, subsequent environmental review. Also, refer to previous Staff Response B-16.

STAFF RESPONSE B-19: It is incorrect to state the Figure 2 of the distributed DEIR "designates" district, centers, (villages), or corridors. The proposed City of Villages strategy would not result in any land use change. As stated in the distributed DEIR (P. III-3) the "designation of villages and adoption of more detailed plans for districts, centers, and corridors would occur through subsequent community plan updates and amendments which would require separate CEQA review." The EIR is a program level EIR addressing a proposed General Plan policy for future growth and development; it appropriately addresses impacts on a citywide/regional basis, and it would be premature and speculative to include the commenter's suggested more specific, community-level information. It should be noted that the inclusion of the suggested community-level information would not only trigger community-level analysis but may allow this EIR to be used for some subsequent development implementing the proposed strategy. This would not be the intent of this EIR or the current proposed City of Villages implementation process.

Table II-1 of the distributed DEIR did disclose the US Census population data for 1990 and 2000 by community planning areas and showed the projected population by selected plan areas according to the SANDAG's adopted 2020 forecast with a disclaimer/footnote which stated that these project population estimates were currently being revised. Preliminary forecast for the year 2030 shows that the region would grow at a slower rate and that the project population forecast for the year 2020 would be lower than the previous 2020 forecast. Refer to previous Staff Response B-2 (Paragraph 1).

The assumptions for the future growth must be clearly spelled out to provide a basis for the current environmental review and to provide a benchmark for evaluating the future designations of the Districts, Centers or Corridors.

B-20

- **Page III-9** – The Draft EIR states that one of the discretionary actions will be “the placement of the TOD overlay over the potential village centers.” Yet neither the Project Description nor the other documents provided with the Draft EIR provide any discussion or description of the Transit Oriented Development (TOD) guidelines. How can the public understand the consequences of applying the TOD overlay to specific properties if the TOD is not described?

ENVIRONMENTAL ANALYSIS

Where appropriate, statements from the NOP/Scoping Letter are included below as italicized text to serve as reference points for the comments provided on the Draft EIR Environmental Analysis.

Land Use

6. *Will the proposal result in a land use which is inconsistent with the adopted community plan land use designation for the site? (page 1 of scoping letter)*

- **Page IV-20** – A similar statement is included as Issue 3 in the Draft EIR. However, there is absolutely no discussion of this issue in the Draft EIR.

B-21

The issue of land use consistency in the Clairemont-Mesa community planning area (and presumably many other communities as well) is especially important since the proposed Urban and Neighborhood Villages and Transit Corridors are identified for areas that the adopted community plan may not already designate for residential or mixed-use. The adopted Clairemont-Mesa Community Plan identifies (page 7) “the loss of commercial services due to residential development on commercially zoned sites” as an issue of concern to the community and states (page 49) that “Clairemont Square and Clairemont Village should be retained as community commercial (emphasis added) centers.” These centers are zoned CC-1-3 which permits residential uses; however, the centers are also located within the Community Plan Implementation Overlay Zone (CPIOZ) pursuant to Land Development Code (LDC) § 132.1402 and as shown on Map Nos. C-771.1 and B-3951. According to § 132.101, “the intent of these regulations is to ensure that development proposals are reviewed for consistency with the use (emphasis added) and development criteria that have been adopted for specific sites as part of the community plan update process.”

The approved Negative Declaration (EQD No. 87-0224) prepared for the community plan update substantiates the position that residential was not proposed for these locations. More specifically, the Negative Declaration states:

B-22

“Type B CPIOZ is . . . recommended for the Clairemont Square and Clairemont Village community commercial centers in order to ensure continuance of community-oriented commercial uses and site design compatible with existing commercial development and surrounding residential areas.”

Note that the Negative Declaration says nothing about compatibility with any future residential development on the site.

In the discussion under Traffic, the Negative Declaration states:

STAFF RESPONSE B-20: The Transit-Oriented Development (TOD) Design Guidelines are described in the “Implementing the City of Villages Strategy” section of the proposed Strategic Framework Element (see page 42 of the March 2002 draft document). For the final draft, this description will be expanded to clarify that “elements” of the TOD Guidelines will be applied, and that the guidelines do not supercede community plan density or land use recommendations. These guidelines applied on an interim basis on discretionary project would require only certain design features.

STAFF RESPONSE B-21: The distributed DEIR analyzed impacts associated with the proposed Strategic Framework Element. The Strategic Framework Element is an amendment to the Progress Guide and General Plan to identify a strategy for the City’s growth and development. Once adopted, the Strategic Framework Element and City of Villages Map will serve to provide direction and guidance for the update of community plans and remaining elements of the Progress Guide and General Plan. It does not replace the land use and zoning in adopted community plans. Village and corridor locations and densities will be refined, adopted, and analyzed as part of subsequent community plan amendments/updates and environmental review. It is correct, therefore, to conclude that the proposal (Strategic Framework Element) does not result in a land-use that is inconsistent with an adopted community plan land use designation.

STAFF RESPONSE B-22: Comments noted. This comment does not address the adequacy of the EIR. It should be noted that General Plans as well as community plans are not static documents; these documents need to be periodically reviewed for their appropriateness. The commenter cites a negative declaration for a plan update which occurred in the late 1980’s. The current Progress Guide and General Plan was approved a decade before. As explained previously, the existing guide for future development chapter in the current General Plan is fast becoming outdated due to the disappearing raw land available for development. In addition, the regional population forecast indicates that there would not be enough dwelling units (per current plan and zone) in 2020 to house the expected population. The vision for future growth in the City is ripe for consideration; hence, the City of Villages strategy was formulated and proposed. If this new vision/strategy is adopted, then community plans would need to be subsequently amended or updated to implement this new strategy.

B-23

"In 1987, the Transportation and Traffic Engineering Division conducted a traffic study for the land uses and densities proposed under (the) revised community plan. The study indicated that many streets in Clairemont Mesa are now experiencing congestion and delay, and that it is expected that more streets will be congested in the future. The study indicated that traffic growth overall should be minimal, since the majority of the community is developed and only limited redevelopment is anticipated (emphasis added)."

It is clear that the adopted Clairemont-Mesa Community Plan did not anticipate the development of residential units in the proposed Neighborhood Village Centers or the Transit Corridor. Therefore, the proposed City of Villages is not consistent with the adopted community plan. The Draft EIR should recognize that a comprehensive plan amendment must be undertaken before any project intended to implement the City of Villages/Strategic Framework Element goes forward.

B-24

Figure 2 also designates a Neighborhood Village along Morena Boulevard between Tecolote Road and West Morena Boulevard. This area is identified in the adopted Clairemont-Mesa Community plan as "Tecolote Gateway Area" and is designated for commercial and industrial uses. This area shows very little promise for a Neighborhood Village without direct and substantial City involvement as occurred with the Uptown District.

In recognition of the necessity to clearly recognize the existing community plans, it is essential that the Strategic Framework Element be modified to include the following language:

B-25

"The next step will be comprehensive community plan updates and amendments. The Strategic Framework map will not be implemented, with respect to new residential development prior to these updates. Prior to the adoption of a comprehensive community plan update, residential development proposed on any parcel within an area designated as an urban/neighborhood village or transit corridor shall be subject to a community plan amendment if the parcel, regardless of zoning, is subject to the Community Plan Implementation Overlay Zone (CPIOZ) or other discretionary review process and the parcel has not previously been allocated a specific number of units in the currently adopted community plan. Any community plan amendments for specific project proposals in advance of comprehensive community plan updates must address cumulative impacts on traffic, parking, transit, public services and facilities, and urban design in a project specific EIR. The cumulative analysis shall consider other projects that may be implemented as part of the Strategic Framework Element."

It should be noted that the Draft EIR Historical Resources section specifically identifies proposed Urban Village Centers and Transit Corridors that would potentially impact historic resources. This same level of detail should be carried throughout the Draft EIR, including Land Use.

Neighborhood Character/Aesthetics

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

STAFF RESPONSE B-23: In 1987, a traffic study was conducted for the Clairemont community. The study incorporated the land uses and known future development at that time and the analysis was conducted at a community wide level. As individual development occurs in time, a detailed traffic study would be done to identify the traffic impacts that are due to the specific development projects. The project traffic study would analyze, in detail, intersection impacts, street segment impacts, driveway locations, surrounding vehicular access to the site, and parking. If the study shows that the subject development causes a significant impact then it would be recommended that the developer mitigate the impact. Also refer to previous Staff Responses B-5 and B-21.

STAFF RESPONSE B-24: It is not correct to state that Figure 2 "designates" a village. The proposed City of Villages strategy would not result in any land use change. Refer to previous Staff Responses B-17 and B-5 (Paragraph 1).

STAFF RESPONSE B-25: The proposed Strategic Framework Element/City of Villages strategy is just the first step, albeit a critical one, towards realizing the vision of a City of Villages. The proposed element further explains that community planning groups and other partners will have a role in the next step, determining the boundaries, acreage, allocation of land uses, residential densities, commercial and employment intensities and design standards for each village and transit corridor site through the community plan update and amendment process. Some community plans already permit village-type development; many community plans will require only focused amendments, and others may require a comprehensive plan update. The City Council is responsible for making the decision. The City Planning Department is also responsible for determining when a project requires a community plan amendment.

It is inappropriate for a policy to predetermine the future type of environmental document prior to a project submittal. The Environmental Analysis Section of the City Development Services Department is responsible for making an initial determination regarding the type and scope of the subsequent environmental document on a project-by-project basis. This process is mandated by CEQA.

Also refer to previous Staff Response B-5 (Paragraph 2) and B-21.

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. (page 2 of scoping letter)

B-26 Pages I-11 and VII-2 – The issues and discussion cited above are extremely important to most communities and should be thoroughly evaluated. Even the Draft EIR Introduction states that “there may be potentially significant effects related to: . . . neighborhood character and aesthetics” Yet in total contradiction to the NOP/Scoping Letter and the Draft EIR Introduction, these issues are relegated to one paragraph under the section entitled “Effects Found Not to be Significant.” To state that the City of Villages will not impact existing single-family neighborhoods simply may not be true in many situations. Densification adjacent to single-family neighborhoods can have significant effects if the project is not designed properly or does not provide adequate parking.

The Draft EIR states that “the identified areas of potential village/corridor may result in structures mostly three stories high but some possibly reaching five stories in a few areas.” (emphasis added). Therefore, it is critical that the EIR discuss the conflict of five-story structures in areas such as Clairemont Mesa where the Community Plan limits development of the sites proposed for Neighborhood Villages and Transit Corridor to thirty feet or three stories.

B-27 More specifically, Figure 5 (page 24) in the adopted Clairemont-Mesa Community Plan identifies a 30-foot height limit for most of the community. According to the Plan (page 22), “the height limit is intended to maintain the low scale character of development in the community” To ensure implementation of the Plan recommendation, the LDC (Chapter 13, Article 2, Division 13) establishes the Clairemont Mesa Height Limit Overlay Zone. According to LDC § 132.1302, “this overlay zone applies to that portion of Clairemont Mesa that is located within the boundaries shown on Map No. C-791.”

In response to the Notice of Preparation, Ms. Carolyn Y. Smith, President of Southeastern Economic Development Committee, stated the following in her letter of July 27, 2001:

B-28 “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.”

It is clear that the above response was not reflected in the Draft EIR discussion of neighborhood character/aesthetics.

B-29 These issues clearly deserve as much attention as the seven pages devoted to Paleontology or the site specific analysis that was conducted for Cultural Resources. Therefore, as stated on page 2 of the scoping letter, the Draft EIR should identify potential areas for urban villages and/or underutilized TOD corridors for density increase and provide comparison of potential resultant bulk and scale of the proposed density/intensity, with existing adjoining development. Where appropriate, the Draft EIR should identify transitional use, buffers, or

STAFF RESPONSE B-26: Refer to previous Staff Responses B-2, B-3 (Paragraph 2), and B-5 (Paragraph 1). The proposed City of Villages strategy would not result in any land use change. As stated in the distributed DEIR (P. III-3) the “designation of villages and adoption of more detailed plans for districts, centers, and corridors would occur through subsequent community plan updates and amendments which would require separate CEQA review.” The distributed DEIR addressed a proposed General Plan policy for future growth and development. It would be premature and speculative to include the commenter’s suggested more specific analysis on community character. The proposal could result in indirect effects. To analyze/address its effect on community character would require an analysis of a potential, indirect effect on surrounding single-family areas by the indirect effect of siting potential villages. This is far too speculative for an EIR addressing citywide strategy for future growth and development without a concurrent land use change. The analysis in the distributed DEIR is consistent with CEQA Guidelines (Sections 15145 and 15146).

STAFF RESPONSE B-27: The distributed DEIR analyzed impacts associated with the proposed Strategic Framework Element. The Strategic Framework Element is an amendment to the Progress Guide and General Plan to identify a citywide strategy for the City’s future growth and development. Once adopted, the Strategic Framework Element and City of Villages Map would serve to provide direction and guidance for the update of community plans and remaining elements of the Progress Guide and General Plan. The village locations on the map merely provide a technical basis for the assumptions needed for the regional transportation model and do not mandate specific densities or village locations. It does not replace land use and zoning in adopted community plans. Village and corridor locations and densities would be refined, adopted, and analyzed as part of subsequent community plan amendments/updates and environmental review. It is correct, therefore, to conclude that the proposal (Strategic Framework Element) does not result in a land use that is inconsistent with an adopted community plan land use designation.

The subsequent implementation of the City of Villages strategy would be tailored to each community plan area with extensive community involvement through the community plan amendment/update process. As part of this tailoring, the development of detailed land use and design guidelines through the community plan update process is recommended in the action plan. These actions would require future environmental review and analysis that more specifically identifies impacts and/or mitigation.

STAFF RESPONSE B-28: Refer to previous Staff Responses B-2, B-3 (Paragraph 2), B-5 (Paragraph 1), and B-27.

The cited SEDC guidelines and the SEDC PDO would be used in the analysis for the subsequent (second-tiered), community-specific CEQA review.

STAFF RESPONSE B-29: Refer to previous Staff Responses B-2, B-3 (Paragraph 2), B-5 (Paragraph 1), and B-27.

As disclosed in the distributed DEIR, the proposed City of Villages Strategy would most likely result in the excavation for lower level parking areas. Well documented paleontological/fossil resources potential by identified geologic formation exist throughout the City of San Diego as well as the region. The EIR describes the geologic formations and their relative potential to contain significant fossils. The mitigation measures are present because they are standard measures for the City, when development requires grading into unweathered bedrock.

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? (page 3 of scoping letter)*

Provide comparison of potential resultant bulk and scale of the proposed density/intensity, with any existing plan-designated view corridors or other public views. (page 3 of scoping letter)

B-30

This issue is not addressed in the Draft EIR. According to Figure 2, the project proposes/assumes Neighborhood Village Centers (Clairemont Drive at Burgener Boulevard and between Morena Boulevard and West Morena Boulevard) and a Transit Corridor (Morena Boulevard) in Clairemont Mesa where redevelopment could result in the obstruction of scenic views of Mission Bay and the Pacific Ocean from public viewing areas. Views to Mission Bay and the Pacific Ocean are illustrated in Figure 3 of the adopted community plan.

As stated on page 3 of the scoping letter, the Draft EIR should provide a comparison of potential resultant bulk and scale of the proposed density/intensity with any existing plan-designated view corridors or other public views.

Water Resources and Conservation

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

1. *Water Resources (Conservation)? (page 4 of scoping letter)*

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. (page 4 of scoping letter)

B-31

• Page IV-69 – IV-74 – The Draft EIR does not address the delivery system or the proposal in terms of the City's adopted Strategic Water Plan. In fact, the Strategic Water Plan is not even listed as a reference in Section IX. The importance of discussing the delivery system is illustrated by the following quote from "Improvements on Tap," a brochure published by the Water Department:

"The Water Department operates and maintains more than 3,000 miles of pipelines – a web of largely unseen infrastructure beneath residential neighborhoods and business thoroughfares. Some of these pipes date back to the late 1800s. While older cast iron mains comprise less than 10 percent of the City's water distribution system, they account for almost 80 percent of the water main breaks. These old pipes are deteriorated and need to be replaced to enhance water service reliability and eliminate flooding of streets and private property when a water main breaks."

Where are these cast iron pipes? What is their proximity to the proposed/assumed Regional Center, Subregional Districts, Urban and Neighborhood Villages Centers and Transit Corridors?

STAFF RESPONSE B-30: The distributed DEIR analyzed impacts associated with the proposed Strategic Framework Element/City of Villages strategy. The Strategic Framework Element is a proposed amendment to the Progress Guide and General Plan to identify a citywide strategy to guide the City's future growth and development. Once adopted, the Strategic Framework Element and City of Villages Map would serve to provide direction and guidance for the update of community plans and remaining elements of the Progress Guide and General Plan. The village locations on the map merely provide a technical basis for the assumptions needed for the quantification of potential impacts and input into the regional transportation model; the map does not mandate specific densities or village locations. It does not replace land use and zoning in adopted community plans. Village and transit corridor locations and densities would be refined, adopted, and analyzed as part of subsequent community plan amendments/updates and environmental review. It is correct, therefore, to conclude that the proposal (the Strategic Framework Element) does not result in a land use that is inconsistent with an adopted community plan land use designation.

Also refer to previous Staff Responses B-2, B-3 (Paragraph 2), B-5 (Paragraph 1), and B-27.

STAFF RESPONSE B-31: The distributed DEIR analyzed impacts associated with the proposed Strategic Framework Element. The Strategic Framework Element is an amendment to the Progress Guide and General Plan to identify a citywide strategy for the City's future growth and development. Once adopted, the Strategic Framework Element and City of Villages Map would serve to provide direction and guidance for the update of community plans and remaining elements of the Progress Guide and General Plan. The village locations on the map merely provide a technical basis for the assumptions needed for the regional transportation model and environmental impact analysis and do not mandate specific density changes or site village locations. It does not replace land use and zoning in adopted community plans. Village and corridor locations and densities would be refined, adopted, and analyzed as part of subsequent community plan amendments/updates and environmental review.

The proposed project, the City of Villages strategy, acknowledges that the infrastructure for the City, including water pipes, is deteriorating in some areas. As part of the strategy, infrastructure is recognized as a necessary companion to any density increases. Also, a key policy recommendation is to only facilitate development patterns that can be served by adequate infrastructure. Further, the Strategic Framework Action Plan calls for more coordination with Metropolitan Wastewater and the Water Department's modeling efforts.

Interviews with City staff from the Metropolitan Wastewater Department indicate that the City of Villages strategy will not impact the department's long term financing plan for all planned utility infrastructure needs, as long as staff from both departments continue to coordinate.

On March 19, 2002, the community of Clairemont Mesa witnessed such a water main break at the intersection of Burgener Boulevard and Field Street adjacent to one of the proposed Neighborhood Urban Villages.

- B-32** As stated on page 4 of the scoping letter, the Draft EIR should address the 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. Also, as stated on page 4 of the scoping letter, the Draft EIR should address the proposal in terms of the City's adopted Strategic Water Plan.

Transportation/Circulation

Streets

1. *Will the proposal result in a substantial impact upon existing or planned private and public, regional, multi-modal transportation systems? (page 6 of scoping letter)*

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. (page 6 of scoping letter)

2. *Will the proposal result in roadway traffic generation in excess of specific/community plan allocation? (page 6 of scoping letter)*
3. *Will the proposal result in an increase in projected traffic which is substantial in relation to the capacity of the street system? (page 6 of scoping letter)*

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. (page 6 of scoping letter)

- **Page IV-22 – IV-32** -The Draft EIR addresses only Issue No. 1 which focuses on the regional transportation system (freeways and prime arterials). Unfortunately, a number of the proposed Urban and Neighborhood Villages are either located on or would clearly impact major and collector streets. Therefore, Issues No. 2 and 3 should also be addressed.

As discussed above, the Negative Declaration prepared for the 1989 update of the Clairemont Mesa Community Plan states:

- B-33** "In 1987, the Transportation and Traffic Engineering Division conducted a traffic study for the land uses and densities proposed under (the) revised community plan. The study indicated that many streets in Clairemont Mesa are now experiencing congestion and delay, and that it is expected that more streets will be congested in the future. The study indicated that traffic growth overall should be minimal, since the majority of the community is developed and only limited redevelopment is anticipated (emphasis added)."

The proposed redevelopment as envisioned by the City of Villages will ensure that traffic growth overall will not be minimal and should be addressed. Furthermore, in the Clairemont

STAFF RESPONSE B-32: The proposed City of Villages strategy to guide future growth and development, as stated in the distributed DEIR, does not directly result in village/transit corridor siting or any land use change. Without specific, future development locations and project-specific detail, the potential impact of local water delivery system is far too speculative and not required of a program-level DEIR. For this policy level analysis, potential water distribution concern was the need for another aqueduct (large underground water pipeline) which the County Water Authority may construct to deliver imported water to San Diego region and its potential adverse effect within the City. It was learned from CWA that such a conveyance system improvement was not needed to supply future water demand.

The commenter's cited "Strategic Water Plan" (July 1997) was considered in the preparation of the distributed DEIR. In addition, updated information was obtained from the City's Water Department and used in the DEIR. Specifically, the current and future per capita water consumption and future reclaimed water usage information were obtained from the Water Department's "2000 Urban Water Management Plan". Other sources considered included the "Updated Water Reclamation Master Plan" (December 2000) and Draft "Update of Long-Term Water Demand Forecast for the City of San Diego" (February 2001).

STAFF RESPONSE B-33: The traffic analysis for the distributed DEIR was done on a citywide level. The "project" consists of an addition of 17,000 to 37,000 attached units added to the already anticipated 580,000 housing units (approximate) under current policies. This is a relatively small incremental numeric increase in comparison. As development occurs within individual communities, a detailed traffic study will be conducted and traffic impacts will be analyzed within the surrounding areas. At that time, Issues #2 and #3 will be further analyzed and discussed for each future site-specific village-type development.

Mesa planning area alone there is an unfunded need of \$15.6 million for transportation projects to serve the population based on the buildout of the currently adopted community plan.

As stated on page 6 of the scoping letter, the Draft EIR should 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.

B-34 The Draft EIR should clearly disclose the unfunded needs for transportation for each community planning area and the City as a whole.

Funding sources for existing as well as future needs should be clearly identified. If not, the impact must be considered significant and unmitigated.

B-35 • Page IV-32 – The second sentence of the first paragraph states that “while the expected features of the proposed project, namely the expanded and improved transit system (emphasis added)”

What is the basis for this statement? The transit system is not part of the project as described in Section III.

• Page IV-32 – The second paragraph states the following:

B-36 “As subsequent implementing discretionary actions such as community plan amendments, rezones, or permits are required for larger village development, more specific traffic analysis would be required. These traffic analysis may refine the contribution of the alternative transportation modes and as a minimum, traffic impacts could be further reduced (emphasis added).”

What is the basis for assuming that traffic impacts could be further reduced? There is no empirical evidence to support this statement. It’s also possible that the traffic impacts may be greater particularly in a localized setting where major and collector streets could be impacted.

• Page IV-32 – The first two sentences of the last paragraph state the following:

“As partial mitigation, the proposed City of Villages encourages the use a vastly improved and expanded transit system by concentrating and directing the growth to urbanized core including such areas as the Mission Valley and Downtown. The proposed project combined with regional efforts by SANDAG and MTDB’s Transit First program could encourage the additional residents engendered by this proposal, to chose alternative less impactive, transportation modes. The planned HOV facilities are expected to increase regional carpooling.”

B-37 First, doesn’t the project and the traffic projections already assume that the growth will be concentrated in areas such as Mission Valley and Downtown? Project features can’t also be mitigation measures.

Second, MTDB’s Transit First program or the HOV facilities cannot be considered mitigation since they are not under the control of the City.

Section 15126.4 (a)(2) of the State CEQA Guidelines states the following:

STAFF RESPONSE B-34: CEQA does not require the discussion of economic effects. However, as part of the City of Villages planning effort, a draft financial consultant report entitled, “City of San Diego, Facilities Financing Report” (April 2002), has been prepared. This study outlines the possible funding mechanism to provide needed facilities.

A framework for providing the needed facilities will occur through an update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

STAFF RESPONSE B-35: Refer to previous Staff Responses B-7 and B-13.

STAFF RESPONSE B-36: As further detailed traffic analysis is done for subsequent individual villages, it is true that additional impacts to street segments or intersections may occur that are not identified in the proposed City of Villages Growth Strategy. However, as part of development projects such as a “Village,” mitigations are recommended if significant negative impacts result from the development.

It is also anticipated that with site specific design, transit improvement details, and further traffic modeling refinements, the walkability and transit ridership rates within the individual communities would increase. This would be studied as subsequent developments are proposed.

STAFF RESPONSE B-37: The City of San Diego must work cooperatively with, and rely upon, many other agencies and jurisdictions in the region in order to successfully provide for current and future needs. For example, we work with SANDAG on regional planning, CALTRANS to build freeways, San Diego County Water Authority for our water supply, and MTDB to plan and build our transit system. The City of San Diego and MTDB are mutually dependant upon each other for the success of the City of Villages and Transit First strategies. This heightened level of cooperation is reinforced through institutional and legislative factors. At an institutional level, the 15-member MTD Board includes four representatives from the City of San Diego. A history of shared goals and implementation actions is also reflected in the numerous City Council agreements with MTDB addressing the operation of public transit services, the use of city streets for light rail transit, transit planning, transit/land use coordination, coordinated construction activities, professional services, and other topics.

While MTDB’s or CALTRANS’ projects are not under the control of the City, much of these project are to be completed within the City to improve regional transportation conditions; improving regional conditions reduces traffic impacts within the City.

"Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of a plan, policy, regulation or other public project, mitigation measures can be incorporated into the plan, policy, regulation or project design."

B-38

The measures related to Transit First program and HOV facilities are not enforceable by the City and, therefore, cannot be considered as mitigation.

According to the City's Environmental Impact Report Guidelines (July 2001), each mitigation measure should be discussed in the following terms:

1. Identify the "trigger" for the measure to be implemented or verified.
2. Describe specific technical requirements and details for all mitigation measures.
3. Assess the effectiveness of each measure: i.e., the extent to which the magnitude of impact will be reduced.
4. Identify the entity responsible for the monitoring.
5. Provide a monitoring and reporting schedule.
6. Define completion requirements and performance standards for each area requiring monitoring.
7. When the applicant has not agreed to a mitigation measure, describe, in a very cursory manner, the feasibility of each mitigation measure in engineering, economic and social terms.
8. If the proposed mitigation could result in a significant impact, disclose the potential impact and provide mitigation.

B-39

No less should be required of a City prepared EIR on a City project.

Parking

4. Will the proposal result in an increased demand for off-site parking? (page 7 of scoping letter)
5. Will the proposal result in effects on existing parking? (page 7 of scoping letter)

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. (page 7 of scoping letter)

B-40

Pages IV-22 - IV-32 - Since parking is not discussed in the Existing Conditions or Impact sub-sections of Transportation/Circulation, what is the basis for the statement of parking in the Significance of Impact sub-section?

Page IV-32 - The first sentence of the third paragraph states:

STAFF RESPONSE B-38: Traffic congestion in terms of the City's proposed strategy to guide future growth and development and the scope of this program level EIR, can not be limited to local control; it is a regional issue which needs not only the City's contribution to its solution but, more importantly, SANDAG's and CALTRANS' efforts to improve the freeway system (i.e. the cited HOV) as well as subregional alternative transportation mode choice, MTDB's Transit First. It is appropriate to include the concurrent efforts of SANDAG, CALTRANS, and MTDB in conjunction with the City's proposed land use policy to attempt to reduce regional/citywide traffic congestion. The distributed DEIR considered all these efforts/mitigation measures and determined that they were partial mitigation and that traffic impacts were significant and unmitigated. Also refer to previous Staff Responses B-7, B-13, and B-37.

STAFF RESPONSE B-39: The vast majority of the EIR's prepared by the City of San Diego, analyzes site-specific development either private development or city facilities. The commenter's cited City's EIR guidelines are generally tailored to these more site-specific projects. For less specific proposal such as this proposed strategy to guide future growth and development and for community plan updates, the City has used a set of more general/conceptual mitigation criteria regarding how potential significant impacts can subsequently be mitigated to below a level of significance by following these criteria. For the distributed DEIR, this was the case for paleontological resources, geologic hazards, noise, historic resources, and hazardous materials. CEQA court cases have resulted in findings that when approving projects that are general in nature such as a General Plan amendment (as opposed to a site-specific development), the lead agency (the City) must devise and approve whatever general mitigation measures are feasible to lessen or avoid significant impacts.

It is incorrect to single out this current COV EIR as "a City prepared EIR on a City project". With the exception of redevelopment EIR's, all EIR's are City prepared. Some may be prepared with the assistance of private consultants; however, all EIR's are ultimately reviewed and determined to be adequate by the Environmental Analysis Section (EAS) of the City's Development Services Department. Specifically, EAS determines the scope of the EIR, approves the range of project alternatives, and makes the impact significance determination.

STAFF RESPONSE B-40: The existing conditions are the current parking requirements. Current requirement for residential parking is two spaces per dwelling unit for a two-bedroom unit and for retail it is typically 2.5 to 5.0 spaces per 1,000 square feet of floor area. Older sections of the City may be affected by a lower level of required parking at the time development occurred. Up until the late 1980s, parking requirements for multiple dwelling units were 1-to-1.5 spaces per unit, and in some older areas there was no requirement for commercial parking.

This discussion was included in this section because the land use analysis in the distributed DEIR, determined that some adopted community plans had goals and policies which preserves existing parking. It was determined that this potential inconsistency with the proposed City of Villages strategy would be resolved with subsequent plan updates and amendment and can be further considered with site specific development plans. It should be noted that parking is rarely an environmental concern unless it pertains to a new, large entertainment complex or a large institutional use in a residential area, uses which attract event attendees.

B-41

"The expressed goal of the proposed strategy is to create more compact urban villages which are less dependent on personal vehicles."

Please cite the specific quote in the "City of Villages" which substantiates this statement.

- Page IV-32 – The second and third sentences of the third paragraph are as follows:

B-42

"Identified potential village sites are existing extensive surface parking lots associated with retail commercial centers. In addition, Transit Oriented Development (TOD) guidelines are proposed to be placed on potential village sites."

What exactly is meant by the above statements?

- Page IV-32 – The last sentence of the third paragraph states:

"The parking problem and its solution would be better defined with subsequent project-specific design."

While this statement may be true, it does not negate the need for a meaningful discussion of potential parking problems in the Draft EIR. For example, the adopted Clairemont-Mesa Community Plan (page 25) states that "the deficiency of off-street parking resulting in a lack of on-street parking . . . has . . . been a problem."

B-43

In the Clairemont-Mesa community planning area, the problem could not be more acute than in the vicinity of Sorrento Tower (2875 Cowley Way) directly east of the proposed/assumed Neighborhood Village at Clairemont Drive and Burgener Boulevard. The 199-unit senior complex was approved a number of years ago with only 42 parking spaces. As a result, numerous Sorrento Tower residents lease or use parking at the Clairemont Village. The problem is also acute south of Burgener Boulevard where the existing apartment complex has inadequate parking. As a result, many of the apartment residents park in the adjacent single-family neighborhood.

The parking problem will be further exacerbated by the designation of the Transportation Area Overlay Zone (TAOZ) and Residential Tandem Parking Overlay Zone (RTPOZ) along transit corridors in Clairemont-Mesa and throughout the City.

As stated on page 7 of the scoping letter, the Draft EIR should address the need for parking presented by the expected increased density/intensity of proposed Urban Villages and/or underutilized TOD corridors.

Air Quality

B-44

- Page IV-43 and IV-44 – Much of the discussion under Mitigation is a rambling discourse as opposed to a clear presentation of mitigation measures. See previous comments on Mitigation under Transportation/Circulation. It's hard to imagine this section being placed verbatim in a Mitigation Monitoring and Reporting Program as required by the City's Environmental Impact Report Guidelines.

- Page IV-44 – The first paragraph states the following:

B-45

"Although partially mitigated, the project's air quality impact remains significant and unmitigated."

This determination was not carried forward to the Conclusion.

STAFF RESPONSE B-41: The cited distributed DEIR statement is supported by many recommendations within the proposed Strategic Framework Element calling for an efficient use of land and an improved multi-modal transportation system. A sampling of closely related statements in the March draft of the proposed Element includes:

"Focus more intense commercial and residential development in new or redeveloped mixed-use village centers in a manner that is pedestrian-oriented and preserves the vast majority of single-family neighborhoods." (p. 14)

"Promote streetscape, bicycle facilities, urban trails, paths and pedestrian connection projects, and retrofits to develop or increase the pedestrian- and bicycle-orientation of each neighborhood and the City as a whole."(p. 16)

"Support a "Transit First" system that makes transit a viable mode of travel for much of the trip-making in the region and makes it the first choice for many trips." (p. 24)

More specific language will be added to the final draft Element to expressly state that the strategy seeks to target growth in a compact development pattern (City of Villages Map section) and reduce dependence on the automobile (Mobility section).

The Urban Form section of the Element addresses the goal of creating more compact (specifically "intense") urban villages to reduce automobile dependence by being pedestrian friendly. See for example the first and second bullets under "Create Diverse Village Centers" on page 14, and all bullet points under "Increase Pedestrian, Bicycle and Transit Opportunities." Further, the entire Mobility section starting on page 22 discusses the goal of reducing automobile dependence.

STAFF RESPONSE B-42: The proposed Strategic Framework Element states that "Many of the proposed Neighborhood Village Centers will be located on older underutilized shopping centers and strip malls" (top paragraph on page 33, The City of Villages Map, Neighborhood Village Centers). Most of these village sites have surface parking, which are expected to be the focus of future redevelopment efforts. On page 42 of the Element, under "Interim Transit-Oriented-Development Design Guidelines," it is stated that the TOD Guidelines will be applied to villages on an interim basis. It should be noted that the proposed placement of TOD guidelines would not result in any land use change.

STAFF RESPONSE B-43: The need for "meaningful discussion of potential parking problems" is beyond the reasonable scope of this document, and furthermore, with no proposed specific village/corridor location or land use intensification, a more detailed discussion of potential parking impacts from subsequent future development is too speculative to address. To clarify commenter's cited section, the following paragraph has been added.

Required parking that would be displaced by adding of subsequent development in the area of parking lots for existing development would be required to be replaced per the Land Development Code (LDC) requirements. For subsequent mixed-use projects and for areas with a high level of transit service, some reduction in overall parking may be available. The parking regulations were revised with the implementation of the LDC in 2000, based upon an extensive parking study, and are considered adequate to meet demand generated by development.

STAFF RESPONSE B-44: Mitigation for any project's air quality impact must conform with the region's air quality strategy to attain/maintain health standards. The distributed DEIR disclosed that the proposed strategy to guide future growth and development would compliment two adopted regional measures, bicycling and transit improvements. A major component of the region's air quality strategy is the state's new vehicle emission standards. The distributed DEIR disclosed the state's contribution to the SIP, specifically, stricter vehicle controls, control of emissions from off-road vehicles, utility engines, and boats, and stricter control of evaporative emissions from fuels. In addition, the distributed DEIR listed a set of possible site-specific mitigation measures (

Table C-7) and their relative effectiveness which totaled 9% to 10% potential reduction in motor vehicle trips. Air quality is a regional environmental impact and its solution/mitigation is most effective on a statewide or basinwide effort. The distributed DEIR disclosed applicable regional and statewide mitigation measures and suggested a list of possible development-specific measures; it clearly stated that these measures were determined to be partial mitigation and that the project's air quality impacts would be significant and unmitigated. It should be noted that subsequent, individual implementing development with specific project design features, may further reduce or mitigate its direct air quality impact.

STAFF RESPONSE B-45: This conclusion of significant, unmitigated air quality impact has been added to the Staff Conclusion. This revised Staff Conclusion was posted on the City's website two weeks after the DEIR distribution.

Noise

1. *Will the proposal result in a significant increase in the existing ambient noise levels? (page 9 of scoping letter)*

B-46 • Page IV-56 – The above issue was identified in the NOP/Scoping Letter but not addressed in the Draft EIR. Yet of the three noise-related issues identified in the NOP/Scoping Letter, this issue is the one that would most likely impact those living adjacent to the proposed Urban/Neighborhood Villages or Transit Corridors.

B-47 • Page IV-58 – Under the discussion of Mitigation Measures, what is the basis for stating that “the noise attenuating site design features for residential uses can be more easily accomplished with a mixed use development”?

B-48 As stated on page 9 of the scoping letter, the Draft EIR should address whether or not the proposal would result in a significant increase in the existing ambient noise levels, particularly in the vicinity of the proposed Urban and Neighborhood Villages and Transit Corridors.

Historical Resources

B-49 • Page IV-77 – The Draft EIR devotes five paragraphs to discussing five potential neighborhood village centers in various locations throughout the City that could result in impacts to significant archaeological or historical resources.

Why is this same level of detail not provided for other issues in the Draft EIR?

Recreational Facilities

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

9. *Parks or other recreational facilities? (page 3 of scoping letter)*

Will the proposal result in an impact upon the quality or quantity of existing recreational opportunities? (page 3 of scoping letter)

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. (page 3 of scoping letter)

B-50 • Page IV-94 – The Existing Conditions section significantly minimizes the need for park and recreation facilities. It’s not just more acres that are required but the provision of adequate facilities on existing park sites as well. In the Clairemont Mesa planning area alone there is an unfunded need of \$115 million for park and recreational projects to serve the population based on the buildout of the currently adopted community plan.

B-51 As stated on page 3 of the scoping letter, the Draft EIR should 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. The Draft EIR should clearly disclose the unfunded needs for park and recreation facilities for each community planning area and the City as a whole. The Draft EIR should also identify any project features which

STAFF RESPONSE B-46: Ambient noise levels were addressed in the distributed DEIR. A list of roadways that are subject to significant ambient noise levels was listed on pg. IV-57. While the impact of additional traffic noise to these roads was not addressed due to the lack of specificity of their location (to be determined subsequently), significant noise impact would be caused by a noticeable 3dB noise increase. This is highly unlikely because a 3dB increase would require the project and/or future traffic to be twice the current traffic.

STAFF RESPONSE B-47: In mixed use developments, the uses which are less noise sensitive can be located closer to noise sources and residential uses can be located further from noise sources. There is less flexibility in locating sensitive uses away from noise sources in a single use, residential development.

STAFF RESPONSE B-48: This level of information will be sought when specific locations for housing and other components of villages are subsequently located. This will be done through the community plan update or amendment process that will follow adoption of the Strategic Framework Plan and City of Villages strategy. Noise impacts will be identified in the subsequent, site-specific environmental documents which would accompany future plan updates or amendments. It is too speculative at this time for the distributed DEIR to have included these detailed analyses in addressing a proposed strategy which would not directly result in any land use change or site any specific village. It should be noted that noticeable increase in traffic noise caused by a village would need to cause a doubling of the traffic in the project vicinity. Doubling of traffic is needed to cause a detectable (possibly significant) noise effect. In a developed, urban area, even considering allowable growth, a single project would not double the traffic, and therefore, would rarely result in a significant noise impact.

STAFF RESPONSE B-49: The distributed DEIR identified only those potential impacts that were known based on the level of information available. It is known that historical resources exist around four identified potential village sites. Many other potential impacts of the proposed City of Villages strategy will not become detailed until specific sites are identified for housing and other development envisioned by the City of Villages strategy. These site-specific impacts will be identified in required, subsequent environmental documents for updates or amendments to individual community plans. Also refer to previous Staff Response B-5 (Paragraph 2).

STAFF RESPONSE B-50: Comment noted. There is a need to acquire more park acreage as well as provide adequate recreational facilities.

STAFF RESPONSE B-51: The distributed DEIR identified potential areas for urban villages and/or underutilized transit corridors on the Strategic Framework Element City of Villages Map (4th draft) located at the end of the document and referred to on page III-5. The proposed City of Villages growth policy and map would not directly result in any land use change nor site villages and corridors. Potential park needs on a citywide basis are discussed under mitigation measures in the Recreational Facilities section of the Environmental Analysis chapter.

would result in open space/parkland acquisition or improvements in existing recreational facilities.

B-52 | Funding sources for existing as well as future needs should be clearly identified. If not, the impact must be considered significant and unmitigated.

B-53 | • Page IV-94 - IV-96 – The discussion of Multiple Habitat Planning Area (MHPA) is inappropriate and misleading in an evaluation of park and recreation facilities. The MHPA is intended primarily as a preserve for biological resources. According to the MSCP Subarea Plan (page 44) passive recreation is considered a compatible land use. However, the overwhelming need of the Clairemont Mesa community is active recreation facilities. As discussed in the City's Progress Guide and General Plans these active recreational needs are provided by the population-based neighborhood and community parks.

B-54 | • Page IV-97 – The first paragraph under Mitigation Measures reads as follows:
"The current Recreation Element of the *Progress Guide and General Plan* currently states that the neighborhood and community recreational facilities should take a variety of forms in response to needs of the residents. It states further that both types of facilities should respond to the unique characteristics of the area; the type of facilities and open space should relate to the population and use characteristics of the services. It goes on to explain that the requirements are guidelines and not fixed needs and that where parkland is difficult to acquire, effort to provide park staff and facilities should be directed to compensate deficiencies in acreage or parkland. The existing General Plan contains flexibility to provide adequate recreational opportunities to the future residents of villages. The current guideline of 20 acres per thousand people is difficult to attain for the higher, density, attached homes envisioned by the proposed growth strategy. For example, 1000 people could be accommodated in 370 attached village homes, at a low-moderate density of 30 units per acre, the current guideline, strictly applied, would result in a need of 20 acres of parks/open space for 12 acres of additional attached homes. These guidelines need to be revised or alternatively applied for the mixed use, higher density attached homes."

How does the above paragraph constitute mitigation? This is really a discussion of impacts that further points out the deficiencies of parks and recreation.

Other Public Services

Fire Protection/Police Protection

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

2. *Fire protection/Police protection? (page 3 of scoping letter)*

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. (page 3 of scoping letter)

B-55 | • Pages I-11 and VII-2 – The Draft EIR Introduction states that "there may be potentially significant effects related to: . . . services . . ." Yet the issue of police and fire protection is

STAFF RESPONSE B-52: CEQA does not require the discussion of economic effects. However, as part of the COV planning effort, feasible facilities financing options have been clearly identified through both the professional services of an independent municipal finance advisor (City of San Diego Facilities Financing Study), and the work of the Finance Citizen Committee that has made public its preliminary recommendations in a memorandum dated March 22, 2002 to the City Council Committee on Land Use and Housing and the Planning Commission.

STAFF RESPONSE B-53 Comment noted. Maps depicting open space and park and recreational facilities have been added to this section.

STAFF RESPONSE B-54: Once the proposed Strategic Framework Element is adopted, the update of the Park and Recreation Element will begin. This element will be updated to:

Expand options for how communities can meet park and recreation standards, recognizing land constraints and joint use opportunities.

Develop a park master plan that includes a needs assessment and implementation strategies to address inequitable access to recreational resources.

Discuss the role of pocket parks and plazas in meeting recreational needs.

The proposed Five-Year Action Plan also contains a provision that an expanded Community Facilities Element will be included in each community plan as part of the subsequent community plan amendment process. These elements will:

Identify public facilities needs, funding sources, and a mechanism for prioritizing the provision of facilities.

Include a variety of facilities that could potentially meet the needs of diverse neighborhoods.

Additionally, the Park and Recreation Department has already undertaken some measures to address the park and recreation deficiencies in communities where land acquisition is difficult due to displacement concerns. While the ultimate goal is to provide the park acreage called for in the general plan, the City has utilized creative solutions to provide recreational opportunities where land is constrained, for example:

Turfing fields to get greater use out of them.

Installing lighting to get longer use out of facilities.

Joint Use of recreational facilities between schools and parks.

This section of the distributed DEIR discloses a conceptual mitigation which would provide park staff and facilities to compensate for deficiencies in acreage of parkland. In addition, the Final EIR also includes a provision/measure to acquire new parkland.

STAFF RESPONSE B-55: In regard to police and fire services, the City's Significance Determination Guidelines states, "A potentially significant impact may be identified when a development will cause the response times for these services to increase. Each department is responsible for determining if a specific project will increase times for their service." The subject project analyzed in the distributed DEIR would not result in any land use changes/intensifications in any specified location or community plan area. The proposed policy, the strategy to guide future growth and development, would not directly result in the need for public safety; therefore this effect was determined to be not significant. It should be noted that this

determination, in no way, precludes further consideration of this issue when more specific, subsequent plan update or amendment to implement the policy is proposed.

relegated to one paragraph under the section entitled "Effects Found Not to be Significant." What is the basis for stating that "facilities and service for the protection of the City's residents can be expected to be provided as the need arises"? In the Clairemont Mesa planning area alone there is an unfunded need of \$3.9 million for fire station projects to serve the population based on the buildout of the currently adopted community plan.

B-56 | As stated on page 3 of the scoping letter, the Draft EIR should 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. The Draft EIR should clearly disclose these unfunded needs for police and fire projects for each community planning area and the City as a whole. The Draft EIR should also identify any project features which would result in new fire and police stations where necessary or expansion of facilities where viable.

B-57 | Funding sources for existing as well as future needs should be clearly identified. If not, the impact must be considered significant and unmitigated.

Schools

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

3. *Schools? (page 3 of scoping letter)*

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. (page 3 of scoping letter)

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. (page 3 of scoping letter)

B-58 | Page VII-2 – The issue of schools is relegated to one paragraph under the section entitled "Effects Found Not to be Significant." What is the basis for the conclusory statement that "by utilizing a long-term planning strategy, the City would be able to jointly coordinate and plan with the potentially affected school districts, so that school districts would plan and provide school related facilities to meet the future education needs of our respective constituents"?

B-59 | As stated on page 3 of the scoping letter, the Draft EIR should consider the new school siting plan for San Diego City Schools as well as other school districts serving the City and analyze the compatibility of the proposed project with existing adopted school facility plans. The Draft EIR should also 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.

B-60 | Funding sources for existing as well as future needs should be clearly identified. If not, the impact must be considered significant and unmitigated.

STAFF RESPONSE B-56: Refer to previous Staff Response B-55. Without at least a community-level information on additional housing/population which would result with subsequent community plan amendment or update, it would be too speculative for this program-level EIR to address the need for new or expanded public protection facilities. It should be noted that police and fire protection are essential municipal services and generally, these needs are routinely met in the City. In terms of CEQA analysis, police or fire needs would have to approach a critical level before these needs pose a significant impact.

STAFF RESPONSE B-57: CEQA does not require the discussion of economic effects. Refer to previous Staff Response B-52.

STAFF RESPONSE B-58: The statement is based upon the fact that the City and various school districts have worked together for a number of years with respect to long range planning and school siting in areas as diverse as San Ysidro, the North City Future Urbanizing Area, and Scripps Ranch. In the more recent past, these efforts have developed into true partnerships and collaborative efforts. Representatives from the San Diego Unified School District served on the Neighborhood Quality and Pilot Village subcommittees of the Strategic Framework Citizen Committee. They helped draft specific policies related to school siting, accessibility, and joint use, including those related to community involvement in site selection, planning, design, and building. Additionally, the City is engaged in a formal planning process, the Model School Program, with San Diego City Schools, the Housing Commission, and Price Charities to design and build an urban school prototype to meet educational, recreational, community, and housing needs in the Castle and Azalea Park neighborhoods in City Heights. The goal is to demonstrate how to decrease residential and business displacement when siting and building schools facilities in more dense, built environments.

STAFF RESPONSE B-59: Information used in preparation of the distributed DEIR included all of the available Proposition MM environmental documents and interviews with Proposition MM coordinators and the San Diego City Schools demographer. San Diego City Schools are already building schools funded with Proposition MM monies in areas with existing needs.

The distributed DEIR analyzed impacts on a citywide and regional basis. Impacts to schools are not considered significant at this time based upon the nature of the project, an amendment to the Progress Guide and General Plan to define a strategy for the City's future growth and development. Once adopted, the proposed Strategic Framework Element and City of Villages Map would serve to provide direction and guidance for the update of community plans and remaining elements of the Progress Guide and General Plan. Village and corridor locations and densities will be refined, adopted, and analyzed as part of subsequent community plan amendments/updates and associated, required environmental review. It is more appropriate to analyze potential impacts and identify specific mitigation measures to schools at that time because the information necessary to make such a determination, location and numbers of units, will be available, and the site will actually be designated and zoned for such development. Historically, school districts have played a critical role in community plan updates and amendments, and the Five-Year Action Plan formally identifies school districts as one of the City's many partners to be involved in the community plan update/amendment process.

STAFF RESPONSE B-60: CEQA does not require the discussion of economic effects. Refer to previous Staff Responses A-7 and B-52.

Maintenance of Public Facilities

B-61

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

4. *Maintenance of public facilities, including roads? (page 4 of scoping letter)*

- This issue is not addressed in the Draft EIR.

Libraries

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

5. *Other municipal services? (page 4 of scoping letter)*

B-62

- Other municipal services or facilities are not addressed in the Draft EIR. In the Clairemont Mesa planning area alone there is an unfunded need of \$21.1 million for library projects to serve the population based on the buildout of the currently adopted community plan. The needed projects include the expansion of all three existing libraries – Clairemont Branch, Balboa Branch and North Clairemont Branch. The Draft EIR should clearly disclose the unfunded needs for library projects for each community planning area and the City as a whole.

B-63

Funding sources for existing as well as future needs for libraries should be clearly identified. If not, the impact must be considered significant and unmitigated.

Biological Resources

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. (page 9 of scoping letter)

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. (page 9 of scoping letter)

B-64

• Page VII-1 - The issue of biological resources is relegated to one paragraph under the section entitled "Effects Found Not to be Significant." Why were the issues presented in the NOP/Scoping Letter ignored in the Draft EIR?

• Page VII-1 - The last two sentences of the last paragraph state the following:

B-65

"The proposal generally affects the City's long-established, urbanized areas and would not result in significant adverse effects on sensitive areas. In addition, the proposal was designed to avoid adjacency concerns with the City's planned habitat preserve, the MHPA."

STAFF RESPONSE B-61: The requirement to discuss maintenance of facilities is beyond the reasonable scope of this EIR which addresses the proposed strategy to guide future growth and development. Furthermore, with no proposed specific village/corridor location or land use intensification, a discussion of potential adverse effects on roads from subsequent future development is far too speculative to address. It should be noted that determining at what level of maintenance of facilities poses a significant impact pursuant to CEQA is moot at best. Deterioration of public facilities such that it poses a health and safety concern may be considered a potential significant impact; however, City has in the past and can be reasonably expected in the future to prevent such a condition.

STAFF RESPONSE B-62: As stated previously, CEQA does not require the discussion of economic effects. Refer to previous Staff Response B-34.

Although the scoping letter does mention "other municipal services" under Public Services, libraries are not called out as a specific consideration. However, the project description states that: "A full range of public facilities would be required as well for each community in which a village center is envisioned." This is a project feature of the proposed Strategic Framework Element, the subject of this environmental analysis.

It should be noted that related to services and facilities, the courts have decided that an economic or social change by itself shall not be considered a significant effect. Specifically to school overcrowding, the courts have determined that overcrowding is not, in itself, a significant environmental impact requiring mitigation under CEQA. It must be assumed that schools are an essential need in any community and that any CEQA determination applicable to schools would be applicable to libraries. The commenter cites three existing libraries available to residents of Clairemont. For past certified City CEQA documents on community plan updates, it was determined to be sufficient that adjoining communities have existing libraries.

"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."

In addition it should be noted that the City of San Diego does not use a per capita formula to decide library size, nor does the general plan list any recommended size for branch libraries. The general plan does mention that when a community reaches about 18,000-20,000 in population, the City should build a branch library to serve the community.

STAFF RESPONSE B-63: As stated previously, CEQA does not require the discussion of economic effects. Refer to Previous Staff Responses B-34 and B-62.

STAFF RESPONSE B-64: Potential adverse effects on biological resources by the proposed strategy to guide future growth and development, was not ignored as asserted. This effect was determined not to be significant and appropriately discussed in the Mandatory Discussion Areas (Chapter VII). As stated in the distributed DEIR, the proposed City of Villages strategy would generally affect long-established, urbanized areas and would not result in significant adverse effect on areas of sensitive biological resources. This determination was based on review citywide Multiple Species Conservation Program (MSCP) biological resources maps and Multi-Habitat Planning Area (MHPA) maps, compared to the draft COV map. The referenced MSCP and MHPA maps are available for review at the offices of the Development Services and Planning Departments.

STAFF RESPONSE B-65: Refer to previous Staff Response B-64.

What is the basis for these conclusory statements? And are they consistent with the following statement on page IV-97 regarding mitigation for the lack of recreational facilities?

“... find alternative sites for enhancement/improvement such as the urban canyons with... trail system to access the canyon.”

B-66 | As stated on page 9 of the scoping letter, the Draft EIR should analyze potential indirect effects of proposed higher densities in terms of compliance with adopted MSCP Subarea Plan Adjacency Guidelines.

B-67 | Also, as stated on page 9 of the scoping letter, the Draft EIR should 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.

ALTERNATIVES

General Intensification Alternative

• Page VIII-3 – The first sentence states that “there would likely be more encroachment into remaining undeveloped open space areas.”

B-68 | What and where are the undeveloped open space areas referenced above? The proposed project is predicated upon the determination that the community plans will soon be developed to capacity. If all of the community planning areas are built out, there would be no undeveloped open space areas available for development. Is the Draft EIR suggesting that areas designated and/or dedicated as open space in the adopted community plans would be developed under this scenario?

B-69 | Page VIII-3 – The next sentence states that “difficult to develop environmentally sensitive parcels would come under somewhat increased development pressure.” If these parcels are in private ownership, the pressure to develop them will still be great regardless of which alternative is adopted. We're talking about the possibility of profit and not the laws of nature.

B-70 | Page VIII-3 – The fourth and fifth sentences state that “the additional residents would most likely continue to use automobiles for most trips with only a small portion walking, bicycling or using transit. This alternative would not be compatible with MTDB's Transit First planning philosophy.”

B-71 | The City of Villages Map as depicted in Figure 2 represents the fourth draft map prepared by the Planning Department. This draft map was prepared in response to the suggestions by Mayor Murphy and Councilmember Atkins to reduce the number of dwelling units in accordance with the more recent 2030 population forecast by SANDAG. The third draft map (dated October 1, 2001), which was in existence during the initial stages of the Draft EIR preparation, also included a category entitled “Multifamily Redesignation.” The Multifamily Redesignation (MR) area included “areas with the opportunities for increasing residential density to enhance neighborhood revitalization and support transit.” In the Clairemont Mesa area the MR areas included existing duplexes along Clairemont Drive and Clairemont Mesa Boulevard. These MR areas in addition to a Transit Corridor along Clairemont Drive south of Balboa Avenue were deleted in the fourth draft map. The re-introduction of these deleted areas would provide an opportunity to upgrade the neighborhoods and possibly could be

STAFF RESPONSE B-66: Refer to previous Staff Response B-64. The potential villages in Mission Valley could be adjoining the MHPA. However, with the planned, subsequent siting of the villages allows consideration of buffers, where appropriate, and discussion of adjacency, if necessary. The specific indirect adverse effects on the MHPA is too speculative to address in this policy-level, programmatic EIR.

STAFF RESPONSE B-67: The distributed DEIR contained the commenter's requested MSCP/MHPA information. The City of San Diego's MSCP status and the targeted MHPA acquisition resulting from potential mitigation for private development were discussed on Page IV-15. The efforts of the City of Chula Vista and the County were disclosed on Page IV-16. In addition, other regional habitat preserve efforts were disclosed on Pages IV-17&18.

STAFF RESPONSE B-68: There are large, privately-owned areas that have been placed in the City's planned habitat preserve (MHPA) in Otay Mesa, East Elliott, and Del Mar Mesa.

The referred to “open space” areas are vacant/undeveloped areas with native vegetation. They maybe within the MHPA, but they are not the commenter's cited dedicated or designated open space. The discussion of this alternative in the distributed DEIR does not even hint that development of dedicated or designated open space would occur.

STAFF RESPONSE B-69: If the implementation of the City of Villages strategy is successful, the creation of compact, mixed use development with more diverse, affordable attached housing, community amenities, walkability, and public transit choices, may lure some residents to the attractive urban villages rather than the relatively distant suburban detached tract home. This may relieve some development pressure posed either directly with future housing development on the remaining vacant/undeveloped areas or indirectly with increased development density adjacent to dedicated or designated open space.

STAFF RESPONSE B-70: The commenter is correct; this alternative would not be compatible with Transit First. Since the City of San Diego is the urbanized core of the region with 40% of the population and 60% of the employment, the Transit First plan would not work without the land use changes promoted by the City's City of Villages strategy. This alternative was discussed as another strategy to meet the projected housing shortfall. Also refer to previous Staff Response B-37.

STAFF RESPONSE B-71: The proposed Strategic Framework Element and the draft City of Villages Map do not preclude the subsequent adoption of a land use designation that implements the concept described in the “Multifamily Redesignation” referred to in your comment as part of any future community plan update. This may be especially appropriate along corridors with planned, future transit improvements. The previous “Multifamily Redesignation” areas are not related to the General Intensification Alternative as described in Section VIII of the distributed DEIR.

The commenter's referenced third draft map was just that - an previous draft; the draft 4th City of Villages map was included in the distributed DEIR and it represents the proposed project's 17,000 to 37,00 additional attached units considered in the analysis.

supported by the community. Since these areas were included in the third draft map, how could it be said that "the additional residents would likely continue to use automobiles for most trips with only a small portion walking, bicycling or using transit." Nor can it be categorically stated that this alternative would not be compatible with MTDB's Transit First planning philosophy.

- B-72 • Page VIII-3 – A sentence beginning in the twelfth line states that "this alternative would also result in serious continuing impacts . . . on sensitive biological resources."

What is the basis for this conclusory statement?

- B-73 • Page VIII-3 – The first sentence of the first paragraph states that "the lack of a clear policy on where and how growth would result in this alternative being particular susceptible to local opposition aimed at density increases."

- B-74 • What is the basis for assuming that a community would not be able to elucidate its own policy on where and how growth would occur? And why would this alternative be more susceptible to local opposition aimed at density increases?

- B-75 • Pages VIII-2 and VIII-3 – The discussion of this alternative is seriously lacking in any meaningful and substantiated evaluation of its potential impacts.

Slowed Growth/Reduced Alternative

- B-76 • Page VIII-4 – The first complete sentence states that "subsidies to growth inducing industries and business would be eliminated in this alternative."

What are the growth inducing industries and businesses that are referenced and to what extent are they being subsidized and by whom?

- B-77 • Page VIII-4 – The first sentence of the second paragraph states that "major advantages of this alternative are that slower population growth would allow more time for any existing utilities and facilities deficiencies to be resolved . . ."

If this is true, then why doesn't the evaluation of the proposed project conclude that there would be deficiencies of utilities and facilities in the short term?

- B-78 • Page VIII-4 – The last sentence of the second paragraph states that with implementation of the Slowed Growth/Reduced Alternative "pressure to develop remaining open space areas and to impact natural resources would be reduced."

Does this suggest that the proposed project would result in pressure to develop remaining open space areas and to impact natural resources?

No Project Alternative

- Page VIII-5 – The fourth paragraph ends with the following statement:

"Overall, the quality of life for many of the City's neighborhoods and residents may decrease."

- B-79 • Please define "quality of life" and provide the basis for making the statement.

STAFF RESPONSE B-72: There is a possibility with this alternative that privately-initiated plan amendments could occur in the future when the population increase and associated lack of housing which would intensify uses in places adjacent to the MHPA or other open space areas containing sensitive biological resources. As previously stated the proposed project, the proposed City of Villages strategy would generally affect long-established, urbanized areas and would not result in significant adverse effect on areas of sensitive biological resources. Refer to previous Staff Response B-3 (Paragraph 3).

STAFF RESPONSE B-73: Unlike the proposed ultimate/subsequent intensifications to allow higher residential yield proposed by COV strategy, pursuant to this alternative, density increases as the housing need becomes more critical and the dwindling developable land within the City approaches zero, could be proposed anywhere that appear ripe for redevelopment including possible intrusions into single family neighborhoods bordering multi-family or commercial areas.

STAFF RESPONSE B-74: The distributed DEIR did not state or indicate that a community would be unable to elucidate its own desires regarding where and how growth should occur. However, since the General Intensification Alternative lacks clear policy direction regarding where and how growth should be accommodated within a community, this alternative would provide no guidance to decision makers faced with making a determination regarding a development proposal that may provide benefits to the City but is disliked by residents opposed to density increases in their neighborhood. This alternative approaches a scenario where as more housing needs arise, needed density increases to accommodate additional housing would be solely market-driven by successful, privately-initiated plan amendments; this scenario would lack the overall growth and urban form vision of the proposed City of Villages strategy.

STAFF RESPONSE B-75: The distributed DEIR's discussion of the General Intensification Alternative described potential impacts as best as can be determined given that specific areas where development or redevelopment would occur are difficult to pinpoint with this alternative because it provides no specific guidance regarding where and how future growth should be accommodated.

STAFF RESPONSE B-76: Growth inducing industries are those that bring new residents into an area as opposed to service industries and facilities that support existing residents. Examples of growth inducing industries are the biomedical research and wireless communication industries that have grown rapidly in San Diego in recent years. Financial incentives (subsidies) that have been offered by the City to encourage these and other industries to remain and expand in San Diego include water and sewer capacity fee reductions, tax credits in enterprise zones and rebates on the city's share of manufacturing personal property tax.

STAFF RESPONSE B-77: The EIR identifies existing deficiencies in utilities and facilities that will impact the proposed project and all the alternatives.

STAFF RESPONSE B-78: The EIR indicates that pressure to develop remaining open space areas and impact natural resources would be less under the Slowed Growth/Reduced Growth alternative than under the project or other alternatives that are designed to accommodate San Diego's anticipated share of regional growth from 2000-2020.

STAFF RESPONSE B-79: Refer to previous Staff Response B-15.

- **Page VIII-5** -- The City of Villages would allow an additional 17,000 more units. It seems unlikely that this increase would justify the follow statements:
- B-80** "Higher intensity projects proposed to implement the City of Villages are necessary to assure the improvements to the existing transit systems. Improvements to the transit systems such as trolley and busing beyond the minimum necessary to address existing needs would be implemented in conjunction with the proposed project."
- Exactly how will the higher density projects assure the improvements to the existing transportation system?
- B-81** What mechanism is proposed to ensure that improvements to the transit systems such as trolley and busing beyond the minimum necessary to address existing needs would be implemented in conjunction with the proposed project?
- B-82** These statements seem very self-serving for the sole purpose of justifying the project. An EIR is supposed to be objective and not for the purpose of supporting the project.
- **Page VIII-6** -What is the basis for stating that "additional traffic congestion associated with the No Project Alternative would increase air quality impacts beyond that associated with the proposed project . . ." According to Table B-3 on page IV-9 freeways and prime arterials (with two exceptions) would be impacted more by the City of Villages. And the text at the bottom of page IV-9 clearly indicates that surface streets within the urban core area would be greater with the City of Villages than with the No Project Alternative.
- B-83**
- **Page VIII-6** -- What is the basis for stating that "focusing growth and housing demand in urbanized areas will reduce the pressure to extend development further into the unincorporated 'back country' areas." The market for infill development (attached units) is very different than the market for homes in the backcountry (detached units on large lots). The determination of what happens in the unincorporated area is solely the responsibility of the County Board of Supervisors. Have they made a commitment to reduce the number of units in the "back country" if the City of San Diego adopts the Strategic Framework Element/City of Villages?
- B-84**
- **Page VIII-6** -- There is no basis for stating that "increasing development pressure on vacant lands associated with implementation of the alternative may also result in adverse impacts to water quality and hydrology not associated with the proposed project." Is the EIR suggesting that the City will not require the incorporation of the latest Best Management Practices for development projects proposed under the No Project Alternative?
- B-85**
- **Pages VIII-5 and VIII-6** -- The Draft EIR does not give serious evaluation to the No Project Alternative. In *Planning and Conservation League v. Department of Water Resources (2000)*, the court held that an EIR was inadequate where it contained only a cursory evaluation of the "no project" alternative. The court pointed out the importance of the "no project" alternative as a point of comparison for the impacts of the proposed project and other alternatives.
- B-86**
- B-87** As stated on page 12 of the scoping letter, "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 (emphasis added)."
- B-88** A meaningful evaluation of each of the potentially significant impacts identified for the proposed project should be provided for the No Project Alternative, the General

STAFF RESPONSE B-80: MTDB's Transit First would not work without the land use changes resulting from the subsequent implementation of the proposed City of Villages strategy. This critical link has been confirmed in on-going coordination meeting with MTDB staff. Also refer to previous Staff Responses B-7 and B-37.

STAFF RESPONSE B-81: Refer to previous Staff Responses to B-7 and B-37 for information on implementation of the Transit First system. As individual village projects are proposed, site-specific determinations will need to be made on whether adequate transit is available to serve the project, or if a viable mechanism exists to phase the implementation of transit services commensurate with the proposed development.

STAFF RESPONSE B-82: The commenter's initial statement (p. 1 of 22) that these EIR comments "are not intended as a critique of the Strategic Framework Element or the City of Villages" and the commenter's concluding concern (p. 22 of 23) that "considerable time and effort" in developing the proposed strategy "should not be jeopardized" by the DEIR, seem to indicate as a minimum, no major objection to the proposed strategy to guide future growth and development. In formulating this strategy, in proposing this growth policy, the City considered commonly held community values and existing resources and carefully formulated the strategy over a three-year period such that adverse effects to single-family residential areas and valued open space were avoided. In addition, the process to implement any subsequent land use change would involve the communities, including the established planning groups. It can generally be stated that the City's proposed strategy is essentially beneficial, if not, inherent well intentioned. The distributed DEIR cited many beneficial aspects of the proposed project because these features are expressed goals of the proposed Strategic Framework Element and the 5-Year Action Plan. In reviewing a proposal regarding a new policy direction such as the current project, it is essential that the distributed DEIR be reviewed in concert with the provided draft Strategic Framework Element text and the 5-Year Action Plan. This comprehensive review is essential because the focus of the EIR pursuant to CEQA, is the potential negative aspects of the proposal. Contrary to the commenter's assertions, the DEIR is objective and not self-serving; it was determined that despite the proposal's generally beneficial construct and even at a solely policy level analysis, the proposed strategy posed potential significant indirect impacts regarding fossils, geologic hazards, noise, historical resources, hazardous material, and recreation, that needed to be mitigated and significant indirect impacts to regional traffic (despite planned MTDB transit and CALTRANS freeway improvements), air quality, and landfills that could not be mitigated at this time.

STAFF RESPONSE B-83: The cited statement deals with the potential of vastly improved regional public transit system to lure motorists into public transportation and its ancillary potential air quality benefits. While the intensified land use envisioned by the proposed City of Villages strategy is needed to implement the Transit First plan, the potential benefits of transit choice for existing residences surrounding the future villages sites or transit corridors were not claimed in the distributed DEIR analysis, and due to the DEIR's policy-level analysis, these potential benefits were not modeled for effects. Both traffic and air quality impacts were determined to be significant and unmitigated. However, in subsequent CEQA review, with specific village/corridor locations and land use intensities and with refined transit improvements, traffic improvements are expected to be detailed and modeled and ancillary air quality benefits would be identified. Also refer to previous Staff Response B-37.

STAFF RESPONSE B-84: Focusing employment growth and residential development in urbanized areas will ease but not eliminate, pressure to develop in unincorporated back country areas. Much of the development anticipated to occur in the future in unincorporated areas will be similar in density and type to that currently occurring in adjacent incorporated areas due to plan amendments and rezonings that may replace large lots with smaller lots. Replacing rural and semi-rural land use designations on the urban fringe with urban designations and zonings is a long standing and continuing process in San Diego County. A current example is the County's current effort to redesignate and rezone county land in unincorporated, eastern portion of Otay Mesa from agricultural to urban industrial and office use.

Intensification Alternative, and the Slowed Growth/Reduced Alternative. A matrix comparing the environmental impacts of these alternatives would be helpful.

SUMMARY COMMENT ON PUBLIC FACILITIES AND SERVICES

On page I of the City of Villages Action Plan is the following statement:

"Improved infrastructure and public facilities must be in place in order for many of the proposed village locations to be viable."

B-89 In the Clairemont Mesa planning area alone there is an unfunded need of \$155.6 million for public facilities (including transportation, libraries, park and recreation facilities, and fire station improvements) to serve the population based on the buildout of the currently adopted community plan. This does not include required upgrades to the sewer and water delivery system or the personnel necessary to operate the library, park and recreation facilities, and police and fire stations. On September 18, 2001 representatives from the Planning Department attended the Clairemont-Mesa Planning Committee to discuss the Strategic Framework Element. Committee members asked how the public facilities and services would be impacted and how the City would respond to remedy the existing deficiencies. The staff responded that the issue of facilities and services would be addressed by the EIR. Unfortunately, this document clearly does not do that in a meaningful manner.

CONCLUSION

B-90 City staff and numerous community volunteers expended considerable time and effort to develop the Strategic Framework Element and City of Villages concept. This labor should not be jeopardized by the inadequate and legally indefensible environmental process put forth by this Draft EIR.

The failure to provide detailed assumptions of the proposed project and to address all of the issues identified in the NOP/Scoping Letter are serious deficiencies. The City should consider correcting these deficiencies by revising the Draft EIR to incorporate the expanded project description and all of the issues identified in the NOP/Scoping Letter and redistributing the Draft EIR for additional public comment. The recirculated Draft EIR could also address/correct the inadequacies of the Draft EIR as discussed above. Section 15088.5 of the State CEQA Guidelines states the following:

- B-91**
- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. . . . 'Significant new information' requiring recirculation, include, for example, a disclosure that:
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal. App.3d 1043)
 - (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

STAFF RESPONSE B-89: The official scope of work was presented in the Scope of Work for the Draft EIR memorandum dated June 4, 2001, and facilities issues are addressed.

A framework for providing the needed facilities will occur through a subsequent update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

STAFF RESPONSE B-90: Disagree with the commenter's assertion that the EIR jeopardizes the extensive effort to develop the proposed Strategic Framework Element and City of Villages (COV) concept. The distributed DEIR adequately addressed all appropriate issues pertaining to the proposed strategy to guide future growth and development. Refer to previous Staff Responses B-2, B-3 (Paragraph 1), B-5 (Paragraph 1), B-9, B-19 (Paragraph 1 B-25, and B-26.

STAFF RESPONSE B-91: Disagree with the commenter's assertion that there are "serious deficiencies". The distributed DEIR has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization. This program-level document adequately addressed all appropriate issues pertaining to the propose strategy to guide future growth and development. Refer to previous Staff Responses B-2, B-3 (Paragraph 1), B-5 (Paragraph 1), B-9, B-19 (Paragraph 1), B-25, and B-26.

These staff responses to comments complete the Final EIR; no new significant information was needed or added to the finalize the EIR. There is no need to revise and recirculate another draft EIR. The commenter's cited CEQA Guidelines section (Section 15087) is incorrect. None of the conditions to recirculate another draft EIR contained in the (correct) Section 15088.5 regarding "Recirculation of an EIR Prior to Certification", apply to this COV EIR.

The applicability of the commenter's cited CEQA case to the proposed City of Villages strategy and this EIR is questionable. The cited case involved an action taken by a state agency without a court-ordered CEQA document addressing cumulative impacts (of a mountain lion hunt). The distributed DEIR was prepared and distributed for public review pursuant to CEQA, and it was finalized prior to any action by the City. Also unlike the cited case, the distributed DEIR contained an extensive, annotated list of project EIR's in the cumulative analysis pursuant to CEQA guidelines (Section 15130 ((b)(1)).

- B-85 | Page VIII-6 – There is no basis for stating that “increasing development pressure on vacant lands associated with implementation of the alternative may also result in adverse impacts to water quality and hydrology not associated with the proposed project.” Is the EIR suggesting that the City will not require the incorporation of the latest Best Management Practices for development projects proposed under the No Project Alternative?
- B-86 | Pages VIII-5 and VIII-6 – The Draft EIR does not give serious evaluation to the No Project Alternative. In *Planning and Conservation League v. Department of Water Resources* (2000), the court held that an EIR was inadequate where it contained only a cursory evaluation of the “no project” alternative. The court pointed out the importance of the “no project” alternative as a point of comparison for the impacts of the proposed project and other alternatives.
- B-87 | As stated on page 12 of the scoping letter, “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 (emphasis added).”
- B-88 ↓ | A meaningful evaluation of each of the potentially significant impacts identified for the proposed project should be provided for the No Project Alternative, the General

STAFF RESPONSE B-85: The distributed DEIR (P.IV-68) did not suggest that future non-village development would not be required to incorporate Best Management Practices (BMP’s). However, the proposed strategy to guide future growth and development would result in infill and redevelopment of existing commercial areas with large open parking areas. This type of mixed use, attached residential redevelopment versus continuing development of detached residences on raw land has much more water quality benefits in that existing, uncontrolled open parking areas would be replaced with either new controlled open areas or subterranean garages with full treatment of any runoff. In addition, attached residences have less potential landscape irrigation runoff, and the more compact, higher density infill results in initial disturbance of less acreage and less permanent impervious surface area.

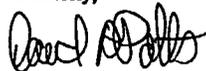
STAFF RESPONSE B-86: The applicability of the commenter’s cited CEQA case regarding the “no project” alternative, is questionable. This cited case which dealt primarily with the appropriate lead agency pursuant to CEQA, also dealt secondarily, as asserted, with the court-determined inadequacy of a “no project” alternative that did not address the existing plan. This contested EIR simply dismissed the existing plan as “infeasible” in its response to public comments. In contrast, the distributed DEIR for the proposed COV strategy discussed the inadequate housing growth allowed in the existing community plans (P. VIII-5) to meet projected future population needs. In addition, the goal of the project was disclosed (P. I-8) as an proposal to meet projected housing shortfall in the year 2020, above and beyond current plan capacity.

STAFF RESPONSE B-87: The range of alternatives addressed in the distributed DEIR is adequate in detail to assess the relative level of impacts and feasibility. The detail of the alternatives analysis was determined by the proposed strategy which would not result in any land use change. The DEIR disclosed the relative impact of each alternative. In terms of the proposed City of Villages strategy’s determined significant and unmitigated impacts, no alternative would avoid or reduce these impacts to below a level of significance. Any alternative which allows additional growth in the City (or in the region) would result in similar impacts which would need to be mitigated. The only exception may be cumulative, growth impacts to the covered sensitive biological resources in the southwestern portion of San Diego County which were mitigated by the adoption of MSCP and the ultimate implementation of the MHPA. The proposed Strategic Framework Element calls for the continued implementation of the MHPA.

STAFF RESPONSE B-88: The degree of specificity of the proposed project allows a qualitative comparison of the alternatives. The suggested use of an impacts matrix is a common aid in understanding of the relative impacts of a site-specific development where impacts of the projects can be compared to those of the alternatives in a quantified, tabular form; however, it is not applicable to this project, the proposed strategy to guide future growth and development. As stated previously, this proposed strategy would not result in any land use change, and the locations of development would be subsequently determined. The alternatives like the proposal are also possible growth policy directions. Therefore, the quantification of all potential impacts posed by the alternatives is not possible, and the preparation of a matrix would not aid in the evaluation.

Thank you for the opportunity to comment. We look forward to reviewing the revised Draft EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Potter". The signature is cursive and somewhat stylized.

David A. Potter, AICP
Chairman

cc: Mayor Dick Murphy
Councilmember Donna Frye, District 6

GREATER GOLDEN HILL PLANNING
COMMITTEE
P.O. BOX 620161
SAN DIEGO, CA 92162

March 26, 2002

To: Planning Department
202 C Street, MS 5A
San Diego, CA 92101

From: Cindy Ireland, Chair

Subject: Comments on Draft City of Villages EIR

CITY OF SAN DIEGO

MAR 27 2002

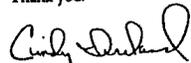
PLANNING DEPARTMENT

After review of the draft EIR, we have the following questions and comments:

- C-1 1. There seems to be a lack of direction and funding for mitigation on traffic. If traffic and transportation can't be mitigated, doesn't this negate the whole village concept?
- C-2 2. The issue of solid waste seems to be highly significant. What alternatives will be considered to mitigate this issue?
- C-3 3. Historic resources are mentioned in the area of 25th street, but in no other areas of Golden Hill. There are significant resources also in the 30th St./Juniper St. area as well. What assurances will be provided to ensure protection of all historic structures, not just those mentioned? The scope of your investigation seems limited.
- C-4 4. There seem to be significant reductions in the planned areas on the map. What was the reason for a reduction? What criteria was used for the reductions/changes that seem to be contrary to the public opinion and comments?
- C-5 5. Has the draft EIR taken into consideration any expansion or reductions to Lindberg field? There could be significant noise abatement issues with some of the "village" areas.
- C-6 6. Bike lanes and bicycle improvements seem to be lacking in all the central urban areas. Shouldn't that transportation issue be addressed as part of the overall plan?
- C-7 7. Air quality will be a significant impact with growth, along with the traffic problems. There seems to be no concrete considerations for improvement. What assurances will be provided to ensure these impacts will be mitigated?
- C-8 8. Historic neighborhoods such as 25th St. would not consider barriers to view as those mentioned on page IV-78. Blocking views from historic areas to new development is highly unacceptable. Community designs must be respected not separated. Will other options be considered? Will this view option be removed?
- C-9 9. Golden Hill has one of the lowest amounts of MHPA acreage in the city. Much of this is undeveloped canyon land that should be protected and preserved. The draft EIR seems to indicate that this could be developed land, would this be a consideration?

C-10 While overall, the draft EIR seems significantly lacking in detailed information, these comments are to provide our general feeling of concern. It is difficult to assess this document in detail when there are so few. For an issue so significant to the future of the city, the draft EIR seems to be very inadequate. Please consider putting additional work into this document before proposing a final version.

Thank you!



STAFF RESPONSE C-1: The distributed DEIR determined that regional traffic impacts are significant and unmitigated. This determination does not negate the whole City of Villages strategy. The City Council as the decisionmaker pursuant to CEQA, can make findings and overriding considerations which state that despite the significant impacts, the proposed strategy presents tangible benefits which outweigh the impacts. The intensified land use envisioned by the proposed City of Villages strategy will generate more traffic; however, this density/intensity of land use is needed to implement the MTDB's expanded transit system plan. The potential benefits of transit choice for existing residences surrounding the future villages sites or transit corridors were not claimed in the distributed DEIR analysis, and these potential benefits were not modeled for effect. However, in subsequent CEQA review, with specific village/corridor locations and land use intensities and with refined transit improvements, traffic improvements are expected to be detailed and modeled, and local impacts would be consequently reduced, if not mitigated. Also refer to previous Staff Response B-37.

STAFF RESPONSE C-2: The commenter is correct; the distributed DEIR determined that solid waste disposal impacts are significant and unmitigated. Two potential solutions would be that the City attempt to site a new landfill and that the privately-owned/operated Sycamore landfill in East Elliott expand its capacity. The City in conjunction with the County, was actively seeking another landfill site in the early to mid-1990's; constraints and preliminary geotechnical studies were conducted. However, County sold its solid waste facilities, and the City shelved its active siting efforts for the past five years. The private landfill could expand its capacity by expanding to the north into MCAS Miramar or to the east into privately owned vacant land in East Elliott; both potential expansions would take time in local, state, and federal permit processing and extensive environmental review.

STAFF RESPONSE C-3: The commenter's cited area at Juniper and 30th Streets, the candidate historic Burlingame neighborhood, is north of the identified, potential village which would be located south of Juniper Street. The proposed Strategic Framework Element contains a section (2.c) which states as its overall goal to "maintain the historic fabric of neighborhoods" and lists specific goals to identify and preserve historic resources. Also refer to previous Staff Response B-5 (Paragraph 2).

STAFF RESPONSE C-4: The commenter's citation of "significant reduction in the planned areas on the map" was due mainly in response to the lower population forecast for the year 2020 which reduced the estimated need of additional homes from 50,000 units (per SANDAG's 2020 forecast) to 17,000 units (per SANDAG's preliminary 2030 forecast for the year 2020).

The 4th draft City of Villages map of the distributed DEIR, included these major revisions:

- Removed many village locations particularly in the urbanized areas and designated these areas as Future (post-2020) Village locations.
- Removed all proposed villages in Mid-City and portions of Eastern Area and College, but will instead establish density minimums when community plans are updated.
- Lowered almost all density maximums which were 110 u/ac to 75 u/ac.
- Lowered almost all Neighborhood Village Center densities which were 45-75 u/ac to 30-45 u/ac or lower except where the community requested higher densities.
- Accounted for phasing of villages in communities with areas of 3 or more villages than where only 2/3 of village will develop by 2020.
- Reduced area of many villages and corridors to include only those commercial areas most likely to redevelop due to site underutilization, and not adjacent multi-family residential areas.

STAFF RESPONSE C-5: The distributed DEIR did consider the latest, projected noise impact area for Lindberg Field in identifying possible impacts on potential future villages and corridors; future changes to the airport is speculative and beyond the scope of this document. The areas of possible aircraft impacts were listed in the DEIR

STAFF RESPONSE C-6: The distributed DEIR discussed the City's draft Bicycle Master Plan and disclosed bicycling as an adopted TCM, a regional air control measure. Bicycling is a part of the overall City of Villages strategy. One of the proposed Strategic Framework Element's goal is to "incorporate the City's Bicycle Master Plan" and another expressed overall goal is to "modify existing street network to better support walking, transit an

GREATER GOLDEN HILL PLANNING
COMMITTEE
P. O. BOX 620161
SAN DIEGO, CA 92162

March 26, 2002

To: Planning Department
202 C Street, MS 5A
San Diego, CA 92101

From: Cindy Ireland, Chair

Subject: Comments on Draft City of Villages EIR

CITY OF SAN DIEGO

MAR 27 2002

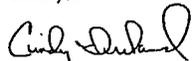
PLANNING DEPARTMENT

After review of the draft EIR, we have the following questions and comments:

- C-1** 1. There seems to be a lack of direction and funding for mitigation on traffic. If traffic and transportation can't be mitigated, doesn't this negate the whole village concept?
- C-2** 2. The issue of solid waste seems to be highly significant. What alternatives will be considered to mitigate this issue?
- C-3** 3. Historic resources are mentioned in the area of 25th street, but in no other areas of Golden Hill. There are significant resources also in the 30th St./Juniper St. area as well. What assurances will be provided to ensure protection of all historic structures, not just those mentioned? The scope of your investigation seems limited.
- C-4** 4. There seem to be significant reductions in the planned areas on the map. What was the reason for a reduction? What criteria was used for the reductions/changes that seem to be contrary to the public opinion and comments?
- C-5** 5. Has the draft EIR taken into consideration any expansion or reductions to Lindberg field? There could be significant noise abatement issues with some of the "village" areas.
- C-6** 6. Bike lanes and bicycle improvements seem to be lacking in all the central urban areas. Shouldn't that transportation issue be addressed as part of the overall plan?
- C-7** 7. Air quality will be a significant impact with growth, along with the traffic problems. There seems to be no concrete considerations for improvement. What assurances will be provided to ensure these impacts will be mitigated?
- C-8** 8. Historic neighborhoods such as 25th St. would not consider barriers to view as those mentioned on page IV-78. Blocking views from historic areas to new development is highly unacceptable. Community designs must be respected not separated. Will other options be considered? Will this view option be removed?
- C-9** 9. Golden Hill has one of the lowest amounts of MHPA acreage in the city. Much of this is undeveloped canyon land that should be protected and preserved. The draft EIR seems to indicate that this could be developed land, would this be a consideration?

C-10 While overall, the draft EIR seems significantly lacking in detailed information, these comments are to provide our general feeling of concern. It is difficult to assess this document in detail when there are so few. For an issue so significant to the future of the city, the draft EIR seems to be very inadequate. Please consider putting additional work into this document before proposing a final version.

Thank you!



bicycling".

STAFF RESPONSE C-7: The distributed DEIR determined that air quality impacts are significant and unmitigated because of the uncertainty of the effect the contribution of area source pollution posed by the 17,000 to 37,000 attached units may have on the attainment of the ozone health standard. The proposed compact, mixed use development pursuant to the proposed strategy with its enhanced walkability and its facilitation of an expanded transit system and regional freeway traffic flow may have some air quality benefits, but the major control of air pollution is dependant on the states stricter motor vehicle emissions controls and the continued control of industrial and commercial sources by the local Air Pollution Control District.

STAFF RESPONSE C-8: Visual effects on the integrity of designated historic structures could be determined to pose a significant impact. The distributed DEIR included mitigation measures addressing the preservation of the setting and the screening of a significant historic structure. The proposed Strategic Framework Element (Section 2.c) lists a specific goal which would "apply design guidelines within (historic) districts."

STAFF RESPONSE C-9: No "developed land" or active parks land uses are suggested or proposed in canyons. The distributed draft EIR suggested potential canyon enhancement and possible passive recreation (trails) in canyons if water or sewer work is needed. The DEIR discussed the opportunity to create green space, passive recreation, possible habitat enhancement, and passive water quality control in these canyons which may be disturbed by pipeline replacement or repair and where pipeline maintenance is needed. The DEIR suggested that if these canyons are visually enhanced and passive trails are constructed, these passive features can be credited towards community recreational needs.

STAFF RESPONSE C-10: Specificity or the amount of detail presented in the distributed DEIR is appropriate for the project proposed. The project is a proposed strategy to guide future growth and development; this strategy would not result in any land use change, and the implementing village and corridor locations would be determined with subsequent community plan amendments and/or updates. The EIR is adequate for a CEQA program-level document addressing the proposed growth policy change without a concurrent land use change.

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CITY OF SAN DIEGO
MAR 13 2002
PLANNING DEPARTMENT

March 11, 2002

Lawrence C. Monserrte, Assistant Deputy Planner
Development Services Department
City of San Diego
202 C Street
San Diego, CA 92101

Re: EIR City of Villages Growth Strategy - Strategic Framework Element
LDR No. 40-1027; SCH No 2001061069

Dear Mr. Monserrte,

The members of the Kearny Mesa Planning Group appreciate the opportunity to comment on the above referenced Draft EIR for the City of Villages Growth Strategy that will replace the current chapter "Guidelines for Future Development" in the San Diego Progress Guide and General Plan. Overall our membership agrees with the concept of the City of Villages and supports the focus to a more village orientated development scheme to accommodate the expected population growth in the City of San Diego. We support the emphasis on walkable neighborhoods, better public transportation, increased density for specific developments or redevelopments (both residential and employment) on existing transportation corridors and less emphasis on the urban sprawl of the past 20 years. We also understand the "Programmatic" concept of this EIR, that it is regional in scope, without the detail of any site specific projects. However we have some issues with the adequacy of the EIR and its analysis as follows:

D-1

1. In section II, a schedule of most the recent census population is provided along with some historical data and projections of population to 2020 using SANDAG's reports. It is stated that SANDAG's population data is being revised and certain figures in the table are left unreported. To do the EIR analysis, some baseline population data was used to run the different scenarios for traffic, housing, etc. The data that was used should be reported. Then the conclusions can be tempered and support requested for a range of future needs based upon the uncertainty of the data used, as it is being revised. We did review the available SANDAG 2020 Regional Forecast, the Technical Update and the City/County Forecast Land Use Alternatives Report, however we do not know if these are what was used. If you do not define or appendix the baseline data used, how can you support or ask us to support the conclusions, without knowing the starting assumptions.

D-2

2. Historic and current data on existing housing units in the City and the vacant land that is planned and zoned for future housing should be provided. Throughout this document references are made to "...17,000 to 37,000 attached homes...", "...17,000 homes is SANDAG's preliminary 2030 population forecast...", page ii, "... 17,000 to 37,000 detached

D-3

STAFF RESPONSE D-1: Comments duly noted.

STAFF RESPONSE D-2: The commenter's cited population table in the distributed DEIR included year 2020 forecast numbers. These population estimates were taken from SANDAG's 2020 Cities/County Forecast (February 26, 1999); the population numbers from this report were rounded. The sole purpose of these selected population numbers was to disclose which communities were still expected to continue grow to the year 2020. Some 2020 population numbers for certain communities were not included in the DEIR table because the 1995 and 2005 numbers in SANDAG's report appeared inconsistent with the Census data. For instance, for Navajo, the Census population numbers were 54,767 for 1990 and 48,565 for 2000 while the SANDAG's report included 50,834 for 1995 and forecasted 54,909 for 2005 and 56,399 for 2020. The preliminary SANDAG 2030 forecast is expected to be lower, and one major cause of reduction is a lower birthrate than expected. The preliminary 2030 forecast did not and still does not have population growth estimates by community plan areas.

STAFF RESPONSE D-3: The proposed City of Villages strategy is expected to result in attached dwelling units only; this correction has been made throughout the text/discussion.

D-4 3. homes...”, page iii, “...current population of nearly 1.3 million...”, “...17,000 dwelling units short of accommodating the projected additional 200,000 people.”, “...previous projections...City would need an additional 50,000 units; this need has been reduced.”, page I-8, (with no explanation of why this reduction of future needs except for some general comments in section VIII “Alternatives”). There are many more references like these throughout the document. In Table I-1, page I-6 and Table I-2, page I-7, the DEIR is very specific about the number of acres of land and units to be lost due to projected MSCP uses or school needs. In Table N-1 MHPA land is categorized to the tenth of an acre. But no baseline data for housing, units or land, is provided except “less than 10% of the City’s 331 square miles is currently available for new development.” Yet this broad scope “programmatic” DEIR reports MSCP and MHPA land in extreme detail. Consistency is important, be broad or specific but mixing the two when it suits your goals, especially when the baseline data is not provided, makes the DEIR suspect and its conclusions unsupported.

D-5 4. In our letter of July 23, 2001 to the Notice of Preparation of the EIR (of which one page was omitted in the DEIR publication), we mentioned the need for an employment land analysis, as it is directly related to population growth. Except for some casual comments as “...employment land decreases, a more efficient use of remaining land is necessary while balancing the overall need of both residential and employment growth.”, page I-10, and comments in the Economic Prosperity paragraph, page III-8, there is no analysis or discussion of necessary land for the ± 113,000 jobs for the forecasted 200,000 additional people by the year 2020. This is a large employment base that could require 1,000 to 2,000 acres of suitable land. In the principal employment areas of downtown, Kearny Mesa, Miramar, Sorrento Mesa, Sorrento Valley and Mission Valley land for businesses to provide these new jobs is not available. Only Otay Mesa has significant land for the future. Are all of these new jobs going to be in that area? If so then the future residential units should be there also. If all the employment land is occupied before the expected population increase occurs, will the population continue to increase without jobs? We do not believe that you can plan for housing for population growth without planning at the same time for the directly associated job growth. The DEIR discusses and reports that water, sewer and landfill needs can be met, that traffic will not be mitigated, that park lands are deficient but the standards can be changed, but nothing about jobs. This is a fatal flaw. The appropriate General Plan chapters should be studied and amended, as required, to include the necessary employment land analysis. That employment land requirement should be a part of this DEIR along with the housing analysis.

D-6 Also in the previous mentioned Economic Prosperity paragraph “Living Wage legislation” was mentioned as being a goal. We would suggest that further study of the effects of similar “social engineering legislation” be done before it became a recommended policy of the City of Villages program. Our understanding is that this type of regulation is not without controversy.

D-7 5. Section III A, “Land Use”, would seem to be the section of the DEIR that should detail some of the existing conditions suggested above, historical and current housing and employment land data. One small correction, page IV-13, effective January 2, 2002 the San Diego County Regional Airport Authority become the designated Airport Land Use Commission per state law and not SANDAG.

STAFF RESPONSE D-4: The distributed DEIR focused on the population forecast, the primary source, and its housing translated housing needs. The DEIR initially described the housing shortfall in the Goals and Objectives section (p. I-8); the commenter’s requested information has been added to this discussion for clarification.

The City’s Multiple Species Conservation Program (MSCP) adopted in 1997 and currently being implemented by the Multi-Habitat Planning Area (MHPA) acquisition is an integral part in the City’s growth management. As disclosed in the distributed DEIR, the MHPA defines the urban limit line which delineates the City and somewhat separates the City from surrounding jurisdictions. The cited specificity of the MSCP/MHPA is due to the requirement that the City along with the County and the City of Chula Vista must correct and annually present progress reports towards implementing the MSCP. The MSCP is important in consideration of any policy directing future growth and development, because its implementation assures the continuing viability of 85 sensitive “covered” species and their habitat in the southwestern subregion of San Diego; it mitigates the cumulative growth effects on these sensitive species and habitat.

STAFF RESPONSE D-5: The proposed Strategic Framework Element and associated Action Plan, which was analyzed in the distributed DEIR, has planned for employment growth. The proposed City of Villages Strategy recognizes the lack of available vacant land for employment uses, and therefore recommends policies to support a more efficient use of existing employment land in conjunction with concentrating such uses in five Subregional Districts, including Kearny Mesa, as identified on the map. The City of Villages strategy recommends that an appropriate level of transit and other public facilities be located in these districts to allow a further intensification of existing employment uses. These districts will also contain Urban Village Centers where a mix of employment and other uses can become even more concentrated.

The transportation model was revised slightly to incorporate analysis of employment data. Employment was increased incrementally in all areas where there is existing employment and new jobs were assigned to the Subregional Districts, Neighborhood Village Centers, and some community planning areas with potential for additional employment, such as Southeastern San Diego. The City of Villages Strategy maintains our current jobs/housing ration of 1.4 (number of jobs to housing units). A total of 838,000 jobs or 50.5% of the region’s jobs are planned to occur in the City. The amount of employment acreage citywide is also contained in the City of Villages Map (Section of the Element).

The primary determinant of the level of domestic and international immigration to San Diego is the availability of employment. Although most of the population growth in the region is due to natural increase (60%), population growth due to migration to the region significantly decreases with low employment availability.

Therefore, employment policies were considered in the EIR analysis at a programmatic level. It is not required by CEQA to do an employment land analysis, only to analyze the environmental impacts of the project. Additional economic policies based on more specific employment land analysis will be provided in the subsequent Economic Prosperity Element that will follow the adoption of the proposed Strategic Framework Element.

STAFF RESPONSE D-6: The Economic Prosperity Subcommittee prepared all of the economic policies in the proposed Strategic Framework Element and associated items contained in the Action Plan where living wage legislation is listed. Generally, it was determined that reductions in inequality and poverty increase the likelihood of a region’s future economic growth. In the San Diego region, approximately 500,000 persons or 19% of the total population are living below the poverty line. Therefore, there is a need to address the “hourglass economy” by creating more “good” jobs with decent wages and secure benefits and by setting job quality standards for low-wage occupations which could be implemented in many ways, one of which is living wage legislation. Living wage legislation could be applied only to City employees, City contracts, or to other targeted industries as determined by the City Council. When the item comes forward for discussion at the City Council, they will determined if this type of legislation appropriately addresses the issues and what the scope of the legislation should be.

STAFF RESPONSE D-7: The commenter is correct. A clarifying sentence is added to the Final EIR text,

D-8

We support the regional coordination of Land Use Plans between the different cities and the unincorporated areas of San Diego County to accommodate the expected population growth. A regional plan is necessary, such as SANDAG is proposing, as growth does not respect political boundaries any more than traffic on our highways. Hopefully this City of Villages will be a model for other Cities to follow.

STAFF RESPONSE D-8: Comments duly noted.

6.

The Transportation/Circulation section uses a SANDAG model with "30,000 detached homes for analysis of the proposed City of Villages" (page IV-30). Throughout this DEIR references are made to attached and detached homes for the City of Villages component. It is our understanding that the City of Villages units will be attached high density residential product for the excess of what the City has available in the current plan and zone. Did SANDAG really use 30,000 detached homes to analyze the City of Villages? Is that consistent? Again on page IV-32 "...17,000 to 37,000 detached homes..." is used to quantify 180,000 to 240,000 additional trips. The lack of specificity and uniformity in the description of the conditions and analysis of this DEIR again makes the whole DEIR suspect. Is this use of detached and attached just a result of poor proofreading or are the terms used interchangeably in this traffic analysis? Two minor issues, the definition of LOS D was omitted from page IV-22. I believe that the evening commute, I-5 from Carmel Valley Road to Via del la Valle, not just to Del Mar Heights Road, is LOS F, at least it appears that way to me as I drive it every day.

STAFF RESPONSE D-9: The proposed City of Villages strategy is expected to result in attached dwelling units only; this correction has been made throughout the text/discussion. 30,000 attached units were modeled for the traffic impacts. The reported 180,000 to 240,000 additional trips modeled is consistent with accepted traffic generation of attached units which range from 6 to 8 daily vehicle trips per attached unit.

D-9

STAFF RESPONSE D-10: Comments duly noted. When subsequent, specific village locations are evaluated, local traffic impacts must be considered and mitigated. The commenter is not entirely correct to suggest that "Villages will be proposed before the necessary "world class" public transportation is in place". It is correct to state the City of Villages strategy is being proposed and could be adopted before the expanded transit is in place; however, the subsequent pilot villages as well as other villages would be coordinated with concurrent transit improvements consistent with MTDB's Transit First.

D-10

The DEIR conclusion, that the City of Villages will result in significant traffic impacts is supported by the group. We agree that the City of Villages developments in conjunction with enhanced public transit will only offer partial mitigation at best. When specific sites are identified later in Community Plan Updates, if the traffic cannot be mitigated, partially due to MTDB not having created the "World Class" transportation system, will these sites fail to be permitted? Should a City of Villages project be built with the expectation of a future transit system to provide the needed mitigation? This is a policy question that will need to be decided as Villages will be proposed before the necessary "world class" public transportation is in place.

STAFF RESPONSE D-11: The commenter is correct. The commenter's critical review is appreciated. The text has been changed to include "subsidence inversion layer" and to delete the "heavier than air" descriptor for carbon monoxide.

7.

In Section C, "Air Quality", a statement was made on page IV-33 "Upon reaching the base of the relatively warmer marine layer, the air pollutants become trapped." Our group does not have a meteorologist as a member, but I did provide the flying for SCOS97 (Southern California Ozone Study 1997), the most recent air pollutants study that was conducted by the California ARB in conjunction the San Diego and South Coast ARB's. I did document the trapping of the air pollutants, the formation of the ozone during the daylight hours and the inversion layer movement as described. However the meteorologists and atmospheric physicists I flew in our airplanes, and those to whom I provided the aircraft data, did not describe this upper air mass as a "warm marine layer". In our sampling profile flying upward through the marine layer we reached a warm, dry boundary layer that trapped the air pollutants from dispersing further upward. This layer I remember being described as a "subsidence inversion layer", warm and dry, not the marine layer, which is relatively humid. I also do not believe the CO (page IV-34) "is heavier than air." It is a minor issue, but I suggest that this chapter be reviewed for accuracy by someone knowledgeable in meteorology or atmospheric physics.

STAFF RESPONSE D-12: Comments duly noted. It should be noted that even with moderate density (30 to 45 du/care) with an underground garage would present a higher degree of water quality control than open surface parking with passive control.

D-11

8.

Paleontology, Geology, Noise, Storm Water/Water Quality, Water Resources and Conservation, Historical Resources, Wastewater, Energy, Solid Waste Disposal all appear to be adequately, and in some instances more that adequately, discussed. We are appreciatively that the Water, Sewer, Energy and Solid Waste providers have adequate

D-12

future supplies, delivery and storage schemes availability to provide for our needs in the future. Reducing surface parking runoff by substituting parking structures will reduce the contaminated storm water runoff, but it remains to be seen if developers will find the cost of structured parking offset by increased density allowances. Today it seems that three story attached housing units with surface parking are the preferred higher density development except in the higher cost downtown area. Other inducements may be required to achieve the hopeful reduction of surface parking.

D-13 9. In Section N, "Recreational Facilities", we agree with the DEIR statements about unmet needs. We also believe that many areas, besides the most urbanized core areas, are deficient in public facilities. We support the flexibility implied in the General Plan for the imposition of park standards on future City of Villages developments. The Draft City of Villages - Strategic Framework Element of the General Plan, page 12, recommends developing "...alternative methods of providing parks and recreational facilities for urban and built-out communities, recognizing available land constraints and seizing opportunities for the creation of more accessible parks and the integration of public space and recreation." In previous letters to the Planning Commission and City Council in support of a proposed "City of Villages" type residential development in Kearny Mesa, we recommended that the current Population Based Park Standards be reviewed as they apply to this "prototype" higher density development that will place residents adjacent to employment land.

D-14 San Diego is blessed with a wonderful variety of geographic features that have allowed for a very desirable standard of living. We applaud the forward thinking of previous City governments that have maintained beach access, created Balboa Park, Mission Bay, Rose, San Clemente, Los Penasquitos and Tecolote Canyons, Mission Trails Park and other public recreation areas. Future City Governments have a real challenge to continue that high standard with the problems of decreased availability of land for public facilities and an increasing population.

D-15 Overall the group found the "programmatic" EIR idea with its broad scope and generalities difficult to support due to the lack of specificity. Is this the intended result. Missing or only lightly mentioned in this broad analysis is the potential effect on existing neighborhoods. What really is the impact when an "attached high density" project is placed into a predominately single family neighborhood? A difficult issue to quantify or maybe even mitigate. We support the concept of the City of Villages but wonder if the 18 year forward planning time frame is really adequate. Growth will not stop in 2020. When will another chapter or concept be required? Will that propose the densification of single family neighborhoods? If so, why not now? At what point in the future can we no longer continue to grow within our political boundaries without greater compromise or degradation of the character of our single family neighborhoods, the overuse of our parks, beaches, bays and canyons, so that we can no longer be "America's Finest City"?

Thank you for your consideration of our comments.

Sincerely,


Buzz Gibbs

cc: Donna Frye

STAFF RESPONSE D-13: Comments duly noted.

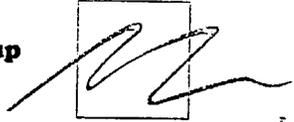
STAFF RESPONSE D-14: Comments duly noted.

STAFF RESPONSE D-15: It is more the appropriate level of analysis and detail required for a policy level impact analysis posed by the proposed strategy to guide future growth and development than it is intent of the distributed DEIR. The DEIR quantified indirect impacts of additional attached units which could result from the subsequent implementation of the proposed strategy. The proposed strategy does not directly result in any land use change, and the potential villages which would be sited with required, subsequent plan amendments or updates, have been located in areas which avoids existing, "predominately" single-family neighborhoods.

While the distributed DEIR analyzed the additional 17,000 to 37,000 attached units to be constructed by year 2020 for impact analysis purposes, the proposed strategy expects this additional buildout capacity to last past 2020, possibly until the year 2030. It should be noted that the initial City of Villages map (included with the NOP) identified potential village/corridor areas for subsequent 45,000 to 70,000 additional attached units; this added capacity may have extended allowable population growth for another 10 to 20 years. This initial effort also avoided single family areas.

The commenter's cited "overuse" of finite amount of parks, beaches, bays, and canyons is a challenge for future growth. The proposed 5-Year Action Plan (April, 2002) which set up implementing actions for the Strategic Framework Element, contains a monitoring program to track the implementation of the proposed strategy. Included in this program is the Legacy 2020 (aka Sustainable Community Program Indicators), a set of quality of life indicators. These indicators are intended to be used to measure long-term sustainability which would include the enjoyment as well as preservation of the commenter's cited parks, beaches, bays, and canyons. As a minimum, this proposed tracking would somewhat quantify the continuing impact of growth and alert the City of any approaching "overuse" condition.

Mira Mesa Community Planning Group



11975 Thomas Hayes Lane
San Diego, CA 92126-1157

March 6, 2002

Lawrence C. Monserrate
Assistant Deputy Director, Development Services Department
202 C Street
San Diego, CA 92101

RE: City of Villages Draft Environmental Impact Report (EIR)

We have reviewed the draft EIR for the City of Villages Growth Strategy and have the following comments.

In Table II-1, Mira Mesa is listed as having a population of 115,000 by 2020. The Mira Mesa Community Plan estimates a population of 82,500 at buildout. Is it the intention of the proposed plan to increase density in Mira Mesa to a level that would cause a population increase of 40% over that anticipated by the community plan? If so, the EIR should identify where this additional population is expected to occur and estimate the need for additional public facilities beyond those in the community plan. While the EIR does list a few specific areas that would be candidates for villages, the description is inadequate since as discussed below a population increase of that magnitude is not realistic. It is likely that this very large increase is simply a mistake, based on out of date or incorrect information. However, if any increase in population beyond the Community Plan estimate is contemplated as part of the City of Villages Plan, the EIR should address the locations where this increase is expected to occur, the amount of population increase at each location, the increase in public facilities needed to accommodate this population, the locations where the public facilities could be constructed, and funding sources for the public facilities.

The Mira Mesa Community Planning Group supports the concept of the City of Villages, and we have reviewed the areas identified in Mira Mesa. Three of these areas would be good candidates for Villages, however there are complicating issues with each of them. Similar complications may occur in other areas proposed as Villages. The EIR should address how the proposed plan would address these situations. The three specific areas in Mira Mesa are listed below.

1. Central Mira Mesa area at Camino Ruiz and Mira Mesa Blvd. There is a large, older shopping center on the northwest corner of the intersection, with existing apartments, a community park, a library, a teen center, a senior center, and a High School close by. The area serves as a civic center for the community, and its central location makes the site clearly optimum for the Village concept. However, the mall is currently undergoing a major renovation without an additional residential component, so it is an unlikely candidate for additional housing in the near future.
2. East end of Mira Mesa Blvd from Casa Mira View on the north side of Mira Mesa Blvd south to Miramar College. The highest density apartments in Mira Mesa (approximately 1800 units at 45 units per acre) are to be constructed soon at Casa Mira View. This is a good opportunity for a near

MAR 07 2002

CITY OF SAN DIEGO

MAR 08 2002
PLANNING DEPARTMENT

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E-1

E-2

E-3

STAFF RESPONSE E-1: The commenter's cited population Table II-1 of the distributed DEIR included year 2020 forecast numbers. These population estimates were taken from SANDAG's 2020 Cities/County Forecast (February 26, 1999); the population numbers from this report were rounded. The sole purpose of these selected population numbers was to disclose which communities were still expected to continue grow to the year 2020. For Mira Mesa, this report shows 482 acres of vacant, developable multiple family residential land in 1995 and 384 acres in 2005; also the household size for Mira Mesa is 3.10 persons per dwelling in the year 2020 compared to 2.74 citywide. The companion SANDAG's 2020 Cities/County Forecast Land Use Inputs Report (September, 1998) shows a transit corridor in Carroll Canyon with six potential transit station focus areas with vacant, developable land; other focus areas include one at Mira Mesa Boulevard and I-15 and Mercy Road at I-15. These SANDAG focus areas are somewhat similar to the potential neighborhood village centers depicted on the 4th draft City of Villages map which was included in the distributed DEIR; the main difference is the potential villages identified on the COV map in the existing shopping centers along Mira Mesa Boulevard. In addition, this SANDAG report identifies 35 acre of mobile home acreage which could be redeveloped.

The preliminary SANDAG 2030 forecast is expected to be lower, and one major cause of reduction is a lower birthrate than expected. The revised 2030 forecast for the year 2020 population would be lower than the 115,000 shown on Table II-1. Mira Mesa has existing residential capacity to continue to grow; the proposed City of Villages strategy would direct its growth to redevelopment and infill along Mira Mesa Boulevard and potential village-type development in Carroll Canyon. The proposed strategy if approved and implemented, would ultimately result in additional, attached units in Mira Mesa; however, the potential yield of the proposed strategy if fully implemented through a subsequent community plan update is not expected even approach the 115,000-population level in the year 2020 as shown on Table II-1.

The proposed City of Villages strategy would not directly result in any land use change, and the potential villages which would be sited with required, subsequent plan amendments or updates; therefore, this EIR does not need to include the commenter's suggested community-level analysis. Refer to previous Staff Responses B-5 and B-27.

STAFF RESPONSE E-2: The cited northwest corner as well as the northeast and the southeast corner have been identified as a potential village on the 4th draft City of Villages map included in the distributed DEIR. As suggested by the commenter, private development could be proposed and approved pursuant to existing community plan and zone. This could be an opportunity lost; projects pursuant to the proposed strategy would need to incorporate public open space, walkability, and other urban design features; however, no potential village location, mixed use density, or intensity would be defined until the subsequent community plan update or amendment occurs. There may be other development on potential village sites in the interim; as a minimum, the discretionary projects would need to incorporate Transit Oriented Development (TOD) design guidelines

STAFF RESPONSE E-3: The commenter's suggested "near-term" village at this location may be possible. MTDB's Transit First envisions a red car station with green car shuttle near this location. Also refer to previous Staff Responses E-1 and E-2.

term Village. However, there is no opportunity for a density increase beyond what exists in the community plan.

E-4

3. Carroll Canyon. The Carroll Canyon projects are being designed under TOD guidelines, but development of residential housing in this area is fifteen to twenty years in the future (two business areas are expected to develop sooner). A density increase is possible in this area, however effective transit is required even for the density of the currently planned project, and community facilities would need to be reevaluated if the population increase were large.

E-5

The other areas identified within the Mira Mesa community are more isolated parcels, and we would recommend concentrating on the larger areas. The Village plan is supposed to be a new concept for community planning, but appears to be focused entirely on areas where density can be increased. How does the plan address community centers such as area 1 above, and areas that are already at high density such as area 2? These areas also need transit and would benefit from the walkability and other design concepts of the plan, so should not be neglected simply because density increase is not feasible.

E-6

The biggest danger and greatest fear of community planning groups and the public in general is that the implementation of this plan focuses only on increasing housing. It is essential that transit and public facilities be a concurrent part of planning process along with housing, and that funding sources for these improvements be identified. Without funding, the public facilities and transit will not happen, and without them no increase in population beyond the Community Plan should be considered.

Sincerely,



Ted Brengel
Chairman
Mira Mesa Community Planning Group

cc: San Diego City Councilmember Brian Maienschein

STAFF RESPONSE E-4: For environmental analysis purposes, the distributed DEIR assumed full buildout of the additional attached homes by the year 2020; however, the proposed strategy may be appropriate for beyond the typical twenty-year, planning horizon. This beyond 2020 scenario is described in the proposed draft Strategic Framework Element. The proposed draft Strategic Framework Element estimates that "certain areas will begin to develop some of these (village) characteristics within the next ten to fifteen years but will not reach their full potential until after 2020." There is existing housing capacity in the current plans to last approximately 15 years; so, although village design is desirable in the near-term, not all additional housing is immediately critical.

It should be noted that Transit First envisions a red car line through Carroll Canyon which could develop with the ultimate development in the cited fifteen to twenty year period. A revised facilities financing plan would be considered with the subsequent community plan update to implement the City of Villages strategy.

STAFF RESPONSE E-5: Refer to previous Staff Response E-2 and E-5.

It is agreed that all areas need transit and the design features of proposed City of Villages strategy; it is not entirely correct to state that potential villages are only places where residential densities could be increased. Other major considerations are the preservation of single-family neighborhoods and open space, infill of underdeveloped commercial/industrial areas with existing large surface parking, coordination with MTDB to match land use and transit planning, and mixed use redevelopment potential of aging shopping centers.

STAFF RESPONSE E-6: Comments noted; these comments do no address the adequacy of the EIR.

It should be noted that MTDB's Transit First envisions a red car service through Carroll Canyon and along Mira Mesa Boulevard in recognition that Mira Mesa has a moderate residential density (9.7 units/acre in 1995) and relatively high existing employment opportunities.

**MISSION VALLEY UNIFIED
PLANNING COMMITTEE**

CITY OF SAN DIEGO
MAR 12 2002
PLANNING DEPARTMENT

7588 Metropolitan Drive
San Diego, CA 92108

March 6, 2002

Mr. Lawrence C. Monserrate, Assistant Deputy Director
City of San Diego Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

SUBJECT: The City of Villages Growth Strategy – Strategic Framework Element Draft EIR

Dear Mr. Monserrate:

F-1

The Mission Valley Unified Planning Committee (MVUPC) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for The City of Villages Growth Strategy – Strategic Framework Element. In addition to our review of the Draft EIR, City staff has made several presentations to the Committee and its Transportation and Land Use Subcommittee. We understand that The City of Villages Growth Strategy – Strategic Framework Element is intended to provide an updated implementation plan to accommodate the anticipated growth of the City through the year 2020 and beyond. This would be the first step in the implementation strategies and would include application of the Transit Oriented Development (TOD) guidelines as an overlay for each of the proposed village centers in the interim, until community plans, zoning and other planning regulations can be amended in accordance with the proposed Strategic Framework Element.

F-2

Although The City of Villages Growth Strategy – Strategic Framework Element is only the initial phase in a proactive approach to accommodating forecasted growth for the region, it will set in place the future character of many of the City's community plans. This is particularly true of those planning areas which are identified in the Strategic Framework Element as receiving the majority of the anticipated growth – Mission Valley is one of those targeted areas. Therefore, the adequacy and completeness of the Draft EIR is especially important to the MVUPC.

CEQA suggests that the letter of comment on an EIR focus on the sufficiency of the document in identifying and analyzing the possible adverse environmental effects and ways in which the significant effects can be avoided or reduced. However, our review of the Draft EIR and the City's Strategic Framework Element has raised issues relative to the proposals contained in the Draft Framework Element. Therefore, our initial comments will present our position on the City's proposal, followed by specific comments on the adequacy and completeness of the analysis presented in the Draft EIR.

STAFF RESPONSE F-1: Comments duly noted.

STAFF RESPONSE F-2: Comments duly noted. It should be noted that the proposed strategy to guide future growth and development, at this current phase, would more accurately set in place the future character of the entire City of San Diego; as the commenter noted for the interim TOD guidelines, the character of the communities would be defined by subsequent community plan updates and amendments. The degree to which the community plans implement the City of Villages strategy would be determined in conjunction with community input during these subsequent planning phases required to implement the City of Villages.

Draft Framework Element Comments

F-3 First and foremost, MVUPC believes that anticipating future growth without resolving the transportation issues associated with that growth is a serious mistake. MTDB's plan to achieve a "world class" transit system is very commendable and promising. We are particularly encouraged by the proposal to have shuttle activity within neighborhoods at a 10-minute interval and we would encourage MTDB to build attractive, covered and conveniently located transit stops.

F-4 However, both the Draft Framework Element and Transit First seem to minimize the effect of choice and preference by the City's thousands of residents, employees and visitors. The success of the proposal is based on creating a transit program that is so enticing and beneficial that we will all (or most of us) want to abandon our cars for buses and shuttles. It seems to ignore the very lifestyle we lead, which includes not only the trip to the workplace, but also dropping the kids off at school or day care; arranging our schedules and travel times to make that end of the school day soccer match, mid-day doctor's appointment or teacher conference, or that half-day spent home with a sick child; and managing an hour for ourselves at the gym or yoga class. The Draft EIR only projects six percent of the population will use transit. Such a low projection for transit use does not seem to support the idea that if we build a better transit system, more people will use it. San Diego is blessed with a wonderful climate and many outside-of-work activities. If the success of the proposed Strategic Framework Element is dependent on expecting a major shift in our lifestyle to more generously embrace transit, it will likely fail. However, if success is measured by the region's ability to accommodate the need for housing, to create high intensity nodes to support a variety of mobility options, and to maintain quality of life, the Strategic Framework Element and EIR should also address a more realistic and equitable approach to accommodating growth which could include an improved roadway system.

F-5 Equally important to the MVUPC and the residents and employees in Mission Valley is the protection of valuable open space areas. The San Diego River is one of our most prized resources; no one appreciates this resource more than those who live and work within its environs. Therefore, we appreciate the Draft Framework Element and Draft EIR's acknowledgement that growth must occur in a manner that our natural resources are protected and preserved. The MVUPC would like to see a discussion in the Draft EIR relative to how the proposed village nodes in Mission Valley impact and/or integrate with the on-going planning efforts for the San Diego River Park Plan.

F-6 We acknowledge the need for housing in order to accommodate the anticipated population growth, but to eliminate parking because we will all use transit seems unrealistic. Additionally, the increase in residential development brings with it the need for additional public services and facilities. An identification of the amount of land to be devoted to schools, parks and other civic/public uses should be identified as part of the overall framework element, rather than deferring this to the community plan level.

Draft EIR Comments

F-7 The project's impacts on traffic and congestion are of paramount concern for Mission Valley. The Draft EIR shows a general increase in traffic and congestion on our roadways and freeways with the projected increase of development in Mission Valley. However, the Draft EIR does not show an analysis of the specific areas targeted in Mission Valley targeted for increased density. Therefore, not enough information is available to provide a complete assessment of potential impacts and evaluate the accuracy of the Draft EIR.

STAFF RESPONSE F-3: Refer to previous Staff Response B-7. The proposed Strategic Framework Element contains the following policy language that addresses the issues of public facilities, transportation and transit:

Public Facilities Policies - Provide for the future population according to the fair share abilities of the City's communities to accommodate new residents commensurate with the public facilities to support them. Use citywide resources to ensure that community facilities, open space, and infrastructure improvements are provided concurrent with intensification.

Mobility Policies - Support a Transit First system that makes transit a viable mode of travel for much of the trip-making in the region and makes it the first choice for many trips. Support incorporation of the Transit First system into the Regional Transit Vision (Figure 1) for inclusion in the 2030 Regional Transit Plan (RTP).

As subsequent community plan updates are prepared, community-specific transportation studies will be prepared to determine which transit and roadway improvements will be required, and how they can be appropriately phased to address traffic impacts as they occur. The traffic studies, impact analysis, and mitigation will be included in a separate, community-level, subsequent environmental document.

STAFF RESPONSE F-4: In the final EIR, transit usage was reanalyzed incorporating additional employment data and more current transit line refinements. This new data indicates that transit use will increase to 9.8 percent of total trips made, rather than 6 percent reported in the distributed DEIR. However, the traffic impact determination remains the same, significant and unmitigated. Also refer to previous Staff Response A-10.

Successful implementation of the proposed Strategic Framework plan is not dependant on a major lifestyle change, but merely seeks to provide a mobility option, a viable alternative choice to the motor vehicle, which was previously unavailable.

With regard to transportation impacts, refer to previous Staff Response A-11. Although the Strategic Framework Element does not focus on regional transportation network changes to reduce traffic impacts, it does not preclude subsequent revisions to the Circulation (Mobility) Element of the General Plan of applicable community plans that could be identified when more specific community-level, transportation or traffic studies are prepared.

STAFF RESPONSE F-5: The proposed Strategic Framework Element contains a discussion and a number of policies addressing protection of open space and natural resources. The policies include the following from the *Conservation and Environment* Section:

San Diego's beauty and character is due in large part due to its unmatched natural resources. San Diego's mountains, beaches, bays, canyons, and other natural landforms define the City. Some of the most unique, and unfortunately threatened and endangered, plants and animals in the nation are concentrated in the San Diego region. San Diego's quality of life hinges on the protection of these natural resources to safeguard San Diego's beauty and biodiversity, and to ensure an adequate supply of resources such as energy and water for the future.

The City of San Diego is committed to protecting and restoring natural resources, preventing harm to the environment and human health, and promoting a sustainable future that meets short-term objectives without compromising San Diego's long-term needs. Environmental quality is a key to the City's quality of life and long-term economic prosperity. The City of San Diego's commitment to conservation and the environment has been demonstrated by the adoption of the Multiple Species Conservation Program (MSCP) and the its continuing implementation by the assembling of the planned preserve, the Multi-Habitat Planning Area (MHPA); this commitment shall guide future decision-making, policies, and programs.

Protecting Resources and Preventing Pollution

Conserve and restore natural and imported resources, such as energy, open space, wildlife, biodiversity, geographical features, soils, coastal features, wetlands, waterways, and water quality and supply through the continuation and enhancement of existing programs and policies, and through the development of programs and policies which utilize proactive measures in addition to corrective actions.

STAFF RESPONSE F-5 (continued):

Conserve renewable and nonrenewable resources, such as natural materials, energy, and water through greater efficiency of use, reuse, use of recycled water, and recycling to reduce the City and region's reliance upon expansion of supply and importation.

Protect environmental and public health by: reducing or eliminating the use of hazardous and toxic materials by residences, businesses, and public agencies; actions to minimize the levels of pollutants entering the air, soil and water.

Encourage Efficient Land Development

Conserve and restore natural and imported resources, such as energy, land, wildlife, biodiversity, open space, soils, geographical features, air quality, and water quality and supply through efficient land use patterns.

Increase landscaping and emphasize the use of deciduous trees and native plants to conserve energy and water, and reduce urban runoff.

To date, the San Diego River Park Plan is a recent, preliminary concept plan and not adopted by the City Council; therefore, there is no discussion of the environmental goals of the plan in the distributed DEIR. It is disclosed, however, in the Land Use section regarding the Levi-Cushman Specific Plan (p. IV-6). Refer to previous Staff Response B-5 for discussion regarding detailed village locations.

STAFF RESPONSE F-6: Refer to previous Staff Response A-10 for a discussion of the amount of transit ridership projected with the subsequent adoption and implementation of the proposed City of Villages strategy. It is anticipated that village parking requirements will reflect a reduction of parking commensurate with the amount of transit, bicycle, and walking trips anticipated. The strategy also recommends parking management mechanisms to avoid parking impacts.

It is beyond the scope of this programmatic EIR to discuss facility acreage requirements throughout the City. The focus of the proposed Strategic Framework Element is on the remediation of existing deficiencies and providing for public facilities and services concurrent with village development. Many general facility requirements are not yet determined and will be identified in the subsequent Public Facilities Element to be prepared subsequent to the adoption of the proposed Strategic Framework Element. Facility requirements for specific facilities will be determined as part of subsequent, individual community plan amendments and updates intended to follow adoption of the Strategic Framework Element and will be discussed in the subsequent, second-tier, environmental documents that accompany them.

Page IV-3 of the Land Use section of the EIR was revised to replace the word "eliminate" with "reduce" the role of parking.

STAFF RESPONSE F-7: Refer to previous Staff Responses F-3 and F-4.

- F-8** We are encouraged by MTDB's Transit First proposal but are uncertain of its success. Additionally, it is unclear as to how the increased transit program will be funded. Will transit be available to accommodate the anticipated growth in Mission Valley? How will we as a community be able to plan for the design of roadways without knowing the affect that transit will have on reducing traffic congestion?
- F-9** The EIR defers the evaluation of many effects until such a time other planning documents are revised and amended. This is particularly true of growth inducing impacts, as well as public facilities and services. CEQA requires that impacts associated with a project be addressed at the earliest possible stages. The EIR needs to present a greater assessment of project impacts, supported by quantitative data to the extent possible. We do not see the detailed analysis typically presented in EIRs to support its conclusions.
- F-10** Additionally, the EIR lacks meaningful mitigation and also defers this to later stages. This is particularly troublesome for anticipated traffic impacts. Page VI-1 states that "*Regional traffic congestion will continue to be a significant problem*". While the Draft Strategic Framework Element promotes increased intensity of development, relying on enhanced use of transit, it is clear that accommodating the traffic levels caused by implementation of the Strategic Framework Element has not been adequately addressed in the EIR.
- F-11** Relative to the potential for land use impacts, the EIR suggests that potential land use conflicts (i.e. significant impacts) will be mitigated by amending and revising community plans and City policies to reflect the new growth policy. This approach to mitigation is not in accordance with CEQA. Significant impacts cannot be mitigated simply by revising a plan. Mitigation for land use impacts needs to be re-evaluated in the EIR and implementable mitigation measures or programs need to be presented.
- F-12** On page III-6, the EIR states that "*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*". However, the EIR does not describe these provisions and fails to analyze the impacts of reallocation of existing resources relative to the ability to provide a community with the necessary services and infrastructure. The Strategic Framework Element seems to imply "trust us"; enough information has not been provided to determine how all this will work out.
- F-13** Relative to project alternatives, it is unclear why the General Intensification Alternative would pressure development of environmentally sensitive parcels. The City's MSCP program is and will be instrumental in protecting sensitive resources, particularly for parcels located in the MHPA. If development is to occur in the MHPA, then an increase in the preserve is required, which will continue to promote the formation of a viable habitat preserve for the San Diego Subarea. Also it is unclear how this alternative would "... result in serious continuing impacts on air and water pollution and possibly on sensitive biological resources". If planning and development occurs in a manner consistent with City regulations, plans and ordinance, development under this alternative should be no more impacting than development as anticipated by the Draft Strategic Framework Element. We would like to see an analysis of what effect this alternative would have on traffic circulation, which is not addressed in the EIR.

STAFF RESPONSE F-8: Funding for Transit First would benefit from the extension of the TransNet gasoline tax; this extension would require a passing statewide vote. Other potential sources include state and federal funds for public mass transportation improvements.

STAFF RESPONSE F-9: The distributed DEIR did not defer any required evaluation as the commenter asserts; it adequately addressed fourteen issues in detail. Needs, supply and/or adverse effects were quantified for traffic, air quality, water supply, wastewater, energy, and solid waste on a citywide or regional basis. This initial consideration of a proposed growth policy direction without any implementing land use change is the earliest stage that CEQA review could occur, and it was determined that an EIR, the most comprehensive of CEQA documents, be prepared to address indirect impacts of this policy. The degree of specificity of the distributed DEIR is appropriate for the proposed strategy without any land use change. Refer to previous Staff Responses B-3 (Paragraph 2) and B-39 (Paragraph 1).

STAFF RESPONSE F-10: The distributed DEIR did not defer any required mitigation; it determined that nine issues were significant. Of these nine significant impacts, sufficient mitigation was identified for six impacts such that they were determined to be mitigated to below a level of significance. The mitigation measures were conceptual and presented the criteria to be followed to develop more detailed measures once subsequent site-specific project location and/or development is determined through community plan amendment or update significant impacts to traffic, air quality, and landfill capacity were determined to be significant and unmitigated.

STAFF RESPONSE F-11: The distributed DEIR indicated that the only land use conflict between the proposed City of Villages strategy and the adopted community plans, is the expressed goal in several plans to preserve existing parking. The listed environmental goals and policies of the adopted plans would be not be inconsistent with the proposed strategy and would be generally retained upon subsequent plan update or amendment to implement the City of Villages. Refer to previous Staff Responses A-3 through A-6.

STAFF RESPONSE F-12: CEQA does not require the discussion of economic effects such as the funding mechanism. However, as part of the overall City of Villages planning effort, a financial report that outlines the possible funding mechanisms to provide needed facilities. This initial proposal is for the adoption of a new growth strategy; its approval by the City Council would provide the direction continued growth in the City would take. This approval sets up subsequent approvals of land use changes and more detailed facilities financing with community plan updates or amendments.

STAFF RESPONSE F-13: Refer to previous Staff Responses B-69 and B-72.

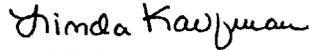
The commenter is incorrect in inferring that the General Intensification Alternative would result in development occurring in a manner consistent with City regulations, plans, and ordinance. While regulations/ordinance may remain unchanged, this alternative would require land use changes throughout the City to accommodate the projected housing shortfall. This may result in housing density increases on the currently existing residential land available for development; these include privately owned lands adjacent to or in the MHPA. While the maximum 25 percent development allowed on parcels in the MHPA may still apply, as a minimum, the indirect effects would be greater with higher densities. Also refer to previous Staff Response B-3 (Paragraph 2).

Mr. Lawrence Monserrate
March 6, 2002
Page 4

F-14 Lastly, the EIR seems to support the project but makes unfounded generalizations about its success. For example, page I-8 of the EIR states that "... the proposed mixed use strategy, if fully implemented with targeted mixed-use intensification and served by a world-class transit system, presents the possibility for long-term, positive effects on regional issues such as freeway congestion and air quality" (emphasis added). Additionally, page III-1 states that "Efficient improved and/or expanded transit service is an essential component of the proposed village design." What if the City approves the Strategic Framework Element with its heavy reliance on an expanded transit program used by an increased ridership and development occurs at the level then mandated by the Strategic Framework Element, but the transit opportunities are never realized or do not come on-line in concert with increased development intensities? It seems as if there needs to be a strong implementation strategy adopted in concert with the Strategic Framework Element, rather than requiring that once it is adopted, subsequent amendments to plans and policies would be required to put the plan into action.

F-15 Again, on behalf of the MVUPC, I would like to thank you for this opportunity to provide comments on the Draft EIR. The MVUPC appreciates the effort that City planners have made to inform our members of the proposed Strategic Framework Strategy Element. We would like to receive a copy of the final EIR for our files and would like to continue to be informed of any actions associated with this project.

Sincerely,



Linda Kaufman, Chair
Mission Valley Unified Planning Committee

STAFF RESPONSE F-14: The commenters cited unfounded generalizations about its (project) success in regards to the transit and traffic is not entirely correct. The project traffic with added attached units and expanded transit was modeled and the results in consideration with the expected decreasing but continuing freeway congestion in the year 2020, were determined in the distributed DEIR to pose significant and unmitigated impacts. Refer to previous Staff Responses A-11, A-15, B-82, and F-4.

STAFF RESPONSE F-15: Comments duly noted. All commenters and community planning group chairpersons will receive a copy of the Final EIR.

OTAY MESA PLANNING GROUP

Established by the
City of San Diego
February 21, 1990
Resolution #90-018

February 11, 2002

Mr. Lawrence Monserrate
City of San Diego
Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

RE: Comments on draft EIR for Strategic Framework Element

Dear Mr. Monserrate:

I am writing to submit comments on the draft EIR for the Strategic Framework Element on behalf of the Otay Mesa Planning Group. While the planning group is in general agreement with the concept of the "City of Villages" strategy included in the Strategic Framework Element, we have several concerns about the village locations identified in the Otay Mesa community.

G-1

The two village sites proposed for Otay Mesa are in and around the area designated as "town center" in the Otay Mesa community plan (hereafter referred to as "Western site"), and in the industrial area surrounding the site of the future Southwestern College/San Diego State University satellite campus (hereafter referred to as "Eastern site"). Our comments and questions on these two sites are as follows:

1. The Western site encompasses an area that is designated as "town center" in the existing community plan. It is important to note that the Otay Mesa Community Plan has not undergone a comprehensive update since 1981. Since that time, the outlook for the area has changed dramatically. This proposed village location encompasses many properties that have approved vested tentative maps, with development intensities already determined. In addition, the Catholic Diocese has purchased property within the area designated as "town center" and is pursuing plans to build a new church and parochial school. The planning group recently voted unanimously in support of this plan, and feel that this would be a benefit to the community. How does the city plan to reconcile its desire to develop this area at urban village densities, when approved plans are already in place?

G-2

2. The planning group feels that it would be a better idea to select a village site that had immediate potential for development, or did not encompass areas with approved maps in place. One such area is in the southwestern quadrant of Otay Mesa. In particular, there are several hundred acres that are currently comprised on one-acre lots that, if consolidated, could provide an ideal site for an urban

G-3

Planning Group
meetings are held on
the 3rd Wednesday
of every month at
Cafe Vallarta
2335 Roll Dr., #10
Otay Mesa, CA 921

For more information
please call
Kristen McDade
(619) 239-9877

MAR 12 2002

CITY OF SAN DIEGO
MAR 13 2002
PLANNING DEPARTMENT

STAFF RESPONSE G-1: Comments duly noted.

STAFF RESPONSE G-2: A potential Urban Village Center is depicted in the western portion of Otay Mesa on the 4th Draft City of Villages map (included in the distributed DEIR) on a site roughly conforming to the Town Center site currently designated in the adopted Otay Mesa Community Plan. The Community Plan calls for this site to consist of a mix of community serving commercial uses and community support uses (such as library, police station, post office, community center etc.) This site is also bisected by a proposed MTDB red car line along Otay Mesa Road and is the location of a proposed red car station. Due to the existing Community Plan designation, MTDB red car service proposal and the vacant nature of the site, this appeared to be an excellent location for a future Urban Village Center. However, preliminary biological resources study for proposed new church and school, indicated that the site has depressions which may contain vernal pools, a very rare, ephemeral habitat not covered by the City's Multiple Species Conservation Program and a City-defined wetland subject to the City's Environmentally Sensitive Lands Ordinance. Recent aerial photographs indicate remaining mima mound topography for this area, another indicator the high possibility that these identified depressions contain vernal pools. In keeping with the expressed goal of the proposed City of Villages strategy to conserve, protect, and restore natural resource, the portion of this potential western village north of Otay Mesa Road been dropped for consideration of subsequent land use changes. (See comment letter from the Diocese of San Diego and associated responses, Comment Letter Kk.)

The Otay Mesa Community Plan is currently under revision. It may be determined during this Plan update that the proposed western Otay Mesa Urban Village (Town Center site) as well as transit routes and stations in the area should be modified. If more specific environmental analysis done during the community plan update for the proposed church and school on the Town Center site, indicate the absence of vernal pools or other sensitive environmental resources and the planning studies done for the plan update indicate that a commercial/community civic center is appropriate at this site, the location of this now deleted western Urban Village Center could be relieved. Depending on these site-specific studies, this potential village site could be shifted, reduced in size, or modified to a potential Neighborhood Village center.

STAFF RESPONSE G-3: Comments noted; these comments do not address the adequacy of the distributed DEIR.

As previously stated. The commenter's cited potential village site as well as those depicted on the draft City of Villages map (included in the distributed DEIR), can be considered for inclusion in the current Otay Mesa Community Plan Update process.

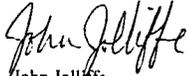
village. This property is currently undeveloped, and there are no plans in place for the properties. This suggestion was conveyed to City staff at the Otay Mesa Planning Group meeting on August 15, 2001, and City staff indicated they would look into this further. The Otay Mesa Planning Group requests that the City explore the possibility of siting a village in this location, rather than the Western site designated on the "City of Villages" map.

G-4

3. The Eastern site, located in the Otay International Center, was selected because San Diego State University and Southwestern College plan to locate a satellite campus in this area. The planning group is concerned with locating residential uses in this area because it is bisected by the southbound truck route, and the alignment for future SR-905 goes through a portion of the proposed village. Heavy truck traffic traversing through a village is not conducive to pedestrian-oriented development. How does the City plan to encourage walkability and incorporate higher density residential uses in an area where heavy truck traffic occurs on a daily basis?

We would appreciate answers to the questions listed above. Thank you for your consideration.

Sincerely,



John Jolliffe
Chair

cc: The Honorable Ralph Inzunza, Councilman, District 8
Gail Goldberg, Director, Planning Department
Coleen Clementson, Program Manager, Strategic Framework Element
Maxx Stalheim, Community Planner, Otay Mesa

STAFF RESPONSE G-4: Comments noted. It should be noted that the commenter's cited potential educational institution would also be noise-sensitive. The advantage of a mixed use urban village center would be that the less sensitive retail commercial buildings can be designed to shield/buffer the residential areas from traffic noise. The La Media overpass can be enhanced to connect the north and south sides of the future SR 905 such that the south side could access the possible red car line along Otay Mesa Road and there could be some walkability between the two sides. This would require innovative design.

Otay Mesa-Nestor Community Planning Committee

Anne Lowry
Environmental Analysis Section (EAS)
City Development Services Department
1222 First Ave MS501
San Diego CA 92101

CITY OF SAN DIEGO
MAR 29 2002
PLANNING DEPARTMENT

19 March 2002

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 Otay Mesa-Nestor Community Planning Committee has reviewed and discussed the proposed Draft Environmental Impact Report. The following are comments and questions are a summation of the planning committee's members about the DIER and our community area:

- H-1** 1 - In attachment 2 page 6 of 24 in the DEIR – it refers to the Otay Mesa-Nestor community plan being updated in 1979. This should read the Otay Mesa community plan.
- H-2** 2 – Industrial developments should be distributed throughout the City and not concentrated in any single area.
- H-3** 3 – Recreation: There are quite a few dedicated parks in our area and in the City, but they have not yet been built. After the parks are built, they need to adequately maintained. How is this going to be accomplished and funded?
- 4 – Facility issues:
- H-4** A – The infrastructure i.e. Streets, Sidewalks, Sewer, Electric Utilities, and Water need to be upgraded prior to any increase in density or growth.
B – Infill development, again, needs the infrastructure upgraded prior to construction.
C – No growth should take place until the streets are widened and sidewalks installed.
- H-5** 5 – Environmental issues, Streets and curbs are needed in our area to assist in storm water runoff.
- H-6** 6 – The Neighborhood Village Center at the Northwest corner of Palm Avenue and Hollister should be expanded to the North to the Golf Driving range.
- H-7** 7 – The Southeast corner of Palm Avenue and Hollister, Why is this area not included in the Neighborhood Village Center?

STAFF RESPONSE H-1: The commenter's referenced Attachment 2 has been revised to include the environmentally-related strategies of the updated Otay Mesa-Nestor Community Plan (1997). (See p. 6 of 24, Attachment 2.)

STAFF RESPONSE H-2: Comment noted. It should be noted that there is a synergistic benefit to locating similar or supporting manufacturing and research businesses in close proximity to each other. Examples of this include the UCSD-UTC-Torrey Science Park area and the Sorrento Valley and West Mira Mesa area; in addition, East Otay Mesa is a developing concentration of businesses. As a minimum, the proposed City of Villages and MTDB's Transit First would better link these areas and also link these employment areas to where workers live by providing a viable alternative public transportation choice.

STAFF RESPONSE H-3: The daunting demand to acquire and develop new parkland in the urbanized area is nearly dwarfed by the challenge to fund the maintenance and operation. The funding would remain the City's general fund, and the City's revenue and its annual allocation would continue to determine the level of maintenance parks would receive.

STAFF RESPONSE H-4: The commenter's cited infrastructure would usually occur with development; in the case of the proposed strategy, these improvements would occur with as future infill and/or redevelopment is proposed. The need for widened street would be considered with the transit accessibility, pedestrian orientation, and any desired traffic calming needs as subsequent village-type development is proposed.

STAFF RESPONSE H-5: Comment noted. It should also be noted that the City is exploring water quality controls at street gutters to trap pollutants - grease, oil and trash. Needed roadway improvements are also addressed as part of the existing financing short fall (2.5 Billion) solutions as addressed in the accompanying KNN report dated June, 2002.

STAFF RESPONSE H-6: The commenter's suggested expansion with a more intensive land use to the north, if implemented, could adversely effect the 100 year floodplain of the Otay River Valley.

STAFF RESPONSE H-7: The southeastern corner of Palm Avenue and Hollister Street contains only a narrow frontage along Hollister which is zoned for industrial uses; the adjoining area to the east is zoned and built as a single-family neighborhood. In keeping with the expressed goal of the proposed City of Villages strategy, this area was not proposed for a potential, future village to avoid the single-family area. However, when a community plan update is proposed to implement COV's, additional areas may be considered.

H-8 8 - The group had concerns about the City buying land for street widening and sidewalks and not leaving adequate clearance from the street to the house.

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,



Jan Johnston
Chairperson Otay Mesa-Nestor Community Planning Committee

STAFF RESPONSE H-8: Comment noted. I should be noted that there would be a possibility that as the City matures and growth rate slows and the growth is directed towards compact, mixed use villages connected to an extensive transit system, the need for widening roads should be decreased. The proposed City of Villages strategy in conjunction with MTDB's Transit First would make this future scenario a possibility.

March 12, 2002

Colleen Clementson, Planner
City of San Diego
Planning Dept./City of Villages
San Diego CA 92101

RE: Response to DEIR#40-1027 Sent VIA FAX: 619-236-6478, 3/12/02, 1:00 pm

I-1 As a local planning board member, I am perturbed at the 'fast track' method the city is moving this project through. Even the City Planning Dept. has little to no knowledge of the projects called "City of Villages" or "Strategic Framework." This EIR of "City of Villages" or "Strategic Framework" found that the "following issues were SIGNIFICANT and COULD NOT BE MITIGATED" at this 'general plan policy review stage', how else will the necessary "mitigation" occur if not planned to remove private property rights? Without even having adequate time or discussion to review this EIR at our local Planning Board level (Peninsula), this is why several of our members and the REST of the City Planning Boards do NOT AGREE that this should proceed without widespread local dissemination of the information and intense feedback from the present communities' residents:

I-2 1. In regards to the "three areas identified" for villages being "located in the noise impact area of Lindbergh Field", this appears to contradict the purpose of the North Bay Redevelopment project, or the Mid City Redevelopment projects, in that the housing, specifically because, if the City intends to "Demolish" the Senior Residential Housing (lower cost) of some 600 units at the corner of Midway and Sports Arena Blvd.(W.Pt. Loma Blvd.), or other low to mid cost housing, no matter which location of the three corridors, from a contractor/developer point of view, without being heavily subsidized by future PUBLIC DEBT, the costs involved in mitigating to 45 decibels (heavy insulation, double or triple paned windows and closed heating/air conditioning systems), according to the 8th Variance at Lindbergh Field, it would make it nearly IMPOSSIBLE to replace with similar, low to mid-cost housing, as noted by a members of several PACs.

I-3 Also, having amenities such as public parkland, open space, SCHOOLS, and other infrastructures ARE NOT being planned for in "an integrated manner" as required by STATE LAW!!! ie. the proposed demolition of a school in the Midway/Peninsula area and NON-increase of a public school at NTC!

I-4 2. I find it interesting that the City continues in its plan of "increasing over the 87,000" already planned housing units, though the 2020 plan has been revised downward.

I-4 As the impacts of NTC's 'redevelopment' will add considerably higher numbers of ADTs (average daily trips), according to the planning depts. own charts, how does the City of Villages' and 'Strategy' JUSTIFY adding an additional "180,000 to 240,000 ADTs? Especially when the "traffic congestion is and would continue to be a regional (and local-under the airport impact areas); therefore, (again), the project's traffic impact is SIGNIFICANT."!!!!

I-5 How can the strategy "retain the intent of the current community specific ... goals and policies," if the 'plans' do NOT include how to mitigate, on a broad plan scale, the traffic that your own summary indicates, any of "these measures are partial mitigation at best, and SIGNIFICANT FUTURE TRAFFIC CONGESTION IMPACTS WILL NOT BE REDUCED TO BELOW A LEVEL OF SIGNIFICANCE."??? Especially as the "modeling...strategy showed (only) a CONSERVATIVE LIMITED EFFECT of the proposed villages on its resultant increased walking and transit use." What is this...another Public Give-Away or Private Property 'Taking' for the benefit of certain city employees and developers? Where will the traffic go??? Where are the amenities going to be built? On whose land? At what cost?

I-6 3. In addition, the Solid Waste Disposal of the proposed growth strategy "would most likely require demolition of existing structures; this would add to the projects impact"!!!! "These impacts (that) are considered POTENTIALLY SIGNIFICANT" MUST be MITIGATED thoroughly or the project will cause the OPPOSITE of its intent.

Sincerely,

Cynthia Conger, Member, Peninsula Community Planning Board, 1537 Rosecrans, Ste.D, 92106

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MAR 12 2002

Strategic Framework

STAFF RESPONSE I-1: The proposed City of Villages strategy has not been "fast track" through as the commenter asserts. The proposed Strategic Framework Element has been drafted through a lengthy and intensive public process. Specifically, there has been five phases of public outreach and involvement starting in the summer of 1999. In summary, from 1999-2002 there have been:

- 20 town hall style public meetings with over 1000 participants;
- 225 Strategic Framework Citizen Committee and Subcommittee meetings;
- 20 public workshops which were taped and televised with the Planning Commission, the Land Use and Housing Committee, and the City Council;
- 10 meetings/workshops with the Community Planners Committee;
- 17 public workshops with planning groups, and
- Over 100 meetings and presentations with community, civic, professional, university, and other stakeholder groups and partners.

A Notice of Preparation announcing the City's intention to prepare a Draft Environmental Impact Report (DEIR) for the proposed City of Villages strategy, was distributed in June, 2001 for a 30-day public review. The DEIR was distributed on January 14, 2002. The public review period for the DEIR was initially to end on March 12, 2002, but was extended to March 26, 2002. This extension allowed a total of 72 days to review and comment on the DEIR. This review period covered three, third Thursdays, the scheduled day of the monthly meeting of the Peninsular Community Planning Board. In contrast, CEQA requires a 45-day review period. Public review was further facilitated by posting the DEIR on the City's web site, and providing copies of the document at City offices, branch libraries, and community service centers.

STAFF RESPONSE I-2: The City (or the proposed strategy) does not intend to demolish any units. The main potential for future redevelopment and/or infill in the vicinity of Midway Drive and Sports Arena Boulevard are the Sports Arena and its large parking lot and the surrounding single-story commercial areas with their open parking lots. The only portion of this potential urban village center that is subject to Lindbergh aircraft noise impact is a small strip of land occupied by Sharp medical offices (southwest of the t-intersection of Kempton and Kenyon Streets).

STAFF RESPONSE I-3: The proposed Strategic Framework Element addresses a wide range of recommendations designed to protect and enhance quality of life, including recommendations on parks, open space, schools, and infrastructure. The Element states that "the provision of adequate infrastructure and public facilities are a linchpin for the entire strategy. Public facilities like schools, parks, and police services must keep pace with population growth and development." In order to finance the needed infrastructure, the proposed City of Villages strategy includes a proposed financing strategy. The Element also recommends that facilities needs, priorities, and potential financing sources be determined at the subsequent community plan level through the preparation of expanded Community Facilities elements and Community Facilities Financing plans.

STAFF RESPONSE I-4: The revised preliminary population projection for the year 2020 indicated that the City would have a shortfall of 17,000 homes over the planned 87,000 units allowed by existing plans. The intensified land use envisioned by the proposed City of Villages strategy will generate more traffic as the commenter asserts; however, this density/intensity of land use is needed to implement the MTDB's expanded transit system plan. The potential benefits of transit choice for existing residences surrounding the future villages sites or transit corridors were not claimed in the distributed DEIR analysis, and these potential benefits were not modeled for effect. Regional traffic impacts were determined to be significant and unmitigated. However, in subsequent CEQA review, with specific village/corridor locations and land use intensities and with refined transit improvements, traffic improvements are expected to be detailed and modeled and consequently

March 12, 2002

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Cynthia Conger, Member, Peninsula Community Planning Board, 1537 Rosecrans, Ste. D, 92106

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MAR 12 2002
Strategic Framework

reduced, if not mitigated. Also refer to previous Staff Response B-37.

STAFF RESPONSE I-5: Refer to previous Staff Response I-4. It should be noted that the traffic modeling results actually showed nine percent of the total trips by transit, walking and biking and not the six percent reported in the distributed DEIR. The table in the Final EIR showing the modeling results has been revised. Traffic impacts remain significant and unmitigated.

STAFF RESPONSE I-6: Project impacts to solid waste disposal has been determined be significant and unmitigated. Possible demolition to achieve redevelopment and infill is included in this determination; the DEIR disclosed possible recycling of demolition material which could partially offset this impact.

**RANCHO BERNARDO
COMMUNITY PLANNING BOARD**

PMB 230 - 11808 Rancho Bernardo Road #123 CITY OF SAN DIEGO
San Diego, CA 92128-1902 MAR 29 2002

PLANNING DEPARTMENT

March 25, 2002

Anne Lowry, Senior Planner
Development Services Dept., Environmental Analysis Section
City of San Diego
202 C Street, MS 501
San Diego, CA 92101

SUBJECT: City of Villages/Strategic Framework Plan Draft EIR

Dear Ms. Lowry:

J-1 The Rancho Bernardo Community Planning Board has reviewed the draft EIR for the City of Villages/Strategic Framework Plan and finds that the draft, as currently prepared, does not adequately address the environmental consequences of the proposed project. In addition, the project description does not provide adequate information to allow the public or the decision-makers to fully comprehend the scope of the proposal. We believe that the document, as currently prepared, is seriously flawed, both in its evaluation of impacts and in its discussion of feasible mitigation. We therefore request that the document be revised to incorporate an adequate analysis of the issues presented below. Further, we request that the revised document be recirculated for public review in accordance with CEQA Section 21092.1, which states, "when significant new information is added to an environmental impact report . . . the public agency shall give notice again . . . before certifying the environmental impact report."

Presented below are the deficiency of the draft EIR that the Rancho-Bernardo Community Planning Board identified at its meeting of March 21, 2002.

1. Project Description

J-2 Section 15124 of the CEQA Guidelines requires an EIR to describe a proposed project in a way that will be meaningful to the public and to the decision-makers. Unfortunately, the draft EIR for the City of Villages project does not meet this standard. In order for the various communities in the City to understand how this proposal could impact their community services, traffic circulation, community character, and overall quality of life, the project description should include information regarding the total acreage included within each village site illustrated on the draft City of Villages Map, the number, or at least a range, of additional dwelling units that could be developed within each village, the anticipated number of residents that would be accommodated by this development, and an estimate of the number of additional school aged children that could be generated within each community.

STAFF RESPONSE J-1: The distributed DEIR has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization. The DEIR appropriately focused impacts on a citywide and/or regional basis and due the proposed strategy which would not directly result in any land use change. Contrary to the commenter's assertion, there is no need for additional analysis and no need to recirculate a revised DEIR.

STAFF RESPONSE J-2: The purpose of this EIR is to analyze the adverse environmental impacts of the proposed project, the adoption of policies to guide the City's future growth and development, not the citywide distribution of housing units or population. Although the distributed DEIR identified potential areas for urban and neighborhood villages and transit corridors on the Strategic Framework Element City of Villages Map (4th draft), these locations merely provide a technical basis for the assumptions needed for input to the regional transportation model and for quantitative analysis of regional and/or citywide impacts. It does not constitute a land use map and does not mandate specific densities or village locations. Subsequent community plan amendments, updates, and/or rezones will be required to actually change the land use required to construct individual villages in the future. The sum of these actions will ultimately determine the planned distribution of any population/housing growth that may occur. These actions will require future environmental review and analysis that more specifically identifies impacts and mitigation.

J-3 Both the draft EIR (page III-4) and the draft City of Villages Map state that the Existing and Future Villages and Transit Corridors are "identified on the map for information purposes only" and are not included in the environmental analysis. However, the map includes the additional statement: "any future community plan updates will include residential density minimums for existing villages locations where there are no stated residential minimum densities in the current community plans." For some communities, such as Rancho Bernardo, the implementation of this statement would result in a requirement for additional areas of residential development, in the form of mixed use, that are not currently anticipated in our adopted community plan. The effect would be no different from that of the Neighborhood Village Center proposal, as the Rancho Bernardo Community Plan does not currently suggest the development of mixed use within any of our commercial areas. Therefore, intensification of residential development, at least for Rancho Bernardo, is implied by this statement and would be realized if the current language were adopted as part of the proposed General Plan amendment. It is therefore required under CEQA that the effects of this additional intensification be evaluated in the EIR.

J-4 The project description also fails to explain why the proposal involves a range of 17,000 to 37,000 units. What is the need as projected by SANDAG? How does this differ from the high or low ends of the range addressed in the EIR? This information is important to the discussion of growth inducement, and must therefore be fully explained in the project description.

J-5 Finally, the project description includes the statement that the TOD overlay will be placed over the potential village centers (III-9). What does this mean and what implications does this have for proposed village center sites that are currently zoned residential restricted? The draft EIR should describe why this overlay is proposed, and how the application of this overlay could influence or focus development proposals on these proposed village sites prior to the adoption of a community plan update.

2. Land Use

J-6 Parking - Page IV-3 states "the goal and objective of the proposed project is to eliminate the need for parking due to expanded and improved public transit." This goal may be achievable in the most urban parts of the City, but it does not appear feasible in communities such as Rancho Bernardo, where the many commercial areas that serve the community are not easily connected by transit. The draft EIR is vague with respect to how the adoption of the Strategic Framework Element would impact parking within the various communities. The EIR should clearly state how parking standards would be changed as a result of the adoption of the General Plan Amendment, and how these changes could impact different communities. If the parking standards are being developed to apply citywide, we cannot support the statement on page IV-32 that reads, "the parking problem and its solution would be better defined with subsequent project-specific design." There must be some analysis of parking in this document, which can then be further defined in a subsequent document.

J-7 Hillside and Sensitive Lands Development - The draft EIR is incorrect in its statement that environmental goals and policies in adopted community plans that address habitat, wildlife, natural open space, and natural drainages would be assured by the adoption of the MSCP. The MSCP protects those areas included within the MHPA, but has no bearing on natural open space or hillsides that are not included within the MHPA. Many community plans

Page 2 of 2

STAFF RESPONSE J-3: Comment noted. The statement was incorrectly located on the map and will be moved into the proposed Strategic Framework Element, more specifically, the Housing Affordability Policies section. The statement has been revised to say "Any future community plan updates will include residential minimums where there are no stated minimum residential densities in the current community plan. The addition of 17,000 to 37,000 units to the already anticipated 580,000 built housing units (approximate) under current policies was evaluated in the DEIR on a citywide level. The effects of additional intensification, if any, will be evaluated at the time of the community plan update or amendment and accompanying environmental review.

STAFF RESPONSE J-4: Comment noted. The following statement has been added to the project description: "In 1999, City of San Diego Planning Department opted to use the Existing Plans and Policies SANDAG 2020 Cities and County Forecast (Alternative 1) as a basis instead of the February 1999 SANDAG Board adopted 2020 Cities and County Forecast (Alternative 4). The SANDAG adopted forecast exceeded the capacity of the current community plans because it incorporated higher residential and employment densities near existing and potential transit stations. Additionally, some of the assumptions resulted in unrealistic population projections in various locations. "

The 2020 Forecast used 1995 as a base year. The demographic data for 1995 was based upon California Department of Finance estimates rather than actual data. In 1995, it was estimated that the City of San Diego had 443,415 total housing units and that by 2020 there would be a need for an additional 117,722 total housing units. This was 52,702 over the City's existing plans and policy forecast.

Starting in the fall of 2000, City staff identified potential villages and transit corridor areas that could incorporate higher residential and employment densities. This data was prepared for use in the regional transportation model analysis in the EIR. Based upon potential development assumptions, a total housing unit range was calculated for each village and transit corridor area. The housing unit ranges for each village and transit corridor were subtracted from the total units forecasted by the existing plans and policies 2020 forecast for the same areas. The result was the total number of additional housing units above the City's existing plans and policies 2020 forecast.

In the fall of 2001, SANDAG released the preliminary 2030 forecast, which used 2000 as a base year. The base year used Census 2000 data. Using actual Census data instead of estimates revealed that the previous 2020 forecast was high.

The preliminary 2030 forecast provided only regional data, so staff extrapolated the City's housing units for the year 2020. It was estimated that the City would need only 17,000 additional housing units above the existing plans and policies forecast for 2020.

Based upon this new data, City staff reduced the number of village and transit corridors areas and development assumptions. Based upon these new assumptions, a range was yielded of 17,000 to 37,000 additional housing units above the City's existing plans and policies forecast.

Traditionally, in its community plans, the City has relied upon residential land use categories that can be achieved within a density range. Although developed for analysis purposes only, the Strategic Framework land use categories rely upon the same concept. It is too speculative to assign a particular number of dwelling units to the village areas on the map, hence, the analysis of the low and high ends of the range.

STAFF RESPONSE J-5: Refer to previous Staff Response B-20. The TOD Guidelines are described in the proposed Strategic Framework Element. They do not supersede community plan density, land use recommendations and zoning, but will be used to address design issues to enhance transit access and walkability on discretionary projects.

STAFF RESPONSE J-6: Comment noted. Adoption of the Strategic Framework Element, in of itself, does not impact parking in any community. The strategy does seek to create conditions that will reduce the demand for parking. Please refer to previous Staff Response A-6. The proposed Element recommends that

communities choose how best to address parking problems through the community plan update/amendment process, and offers a range of potential solutions; it does not recommend the creation of citywide parking standards.

STAFF RESPONSE J-7: The distributed DEIR did not intend to suggest that adoption of the MSCP assures implementation of all environmental goals and policies in adopted community plans. The Progress Guide and General Plan, many of the adopted community plans and the recently adopted OS-1-1 zone all seek to recognize and protect the multiple values of open space over and above habitat and resource protection. The proposed Strategic Framework Element and Action Plan recommend the evaluation of the Environmentally Sensitive Lands (ESL) regulations to determine how well they implement the proposed Elements' values calling for the natural environment to dictate the City's form, including urban open spaces. It should be noted that the City's biological guidelines which include the mitigation ratios for biological impacts implements the agreements/conditions of the MSCP and have been codified in the ESL; the guidelines and the ordinance are linked to the adoption of MSCP. In addition, the proposed Element includes policies to actively conserve the remaining land, open space, and geographical features of the City.

recommend the preservation of certain hillsides and canyons for reasons other than biological protection. A hillside or ridge feature may be important merely because it provides community character. The MSCP provides no protection in this instance. It is not adequate, nor appropriate, to rely on the MSCP to establish that the proposal will have no impacts on hillsides. The draft EIR should evaluate how, if at all, development of the various village sites designated on the draft City of Villages Map could impact the existing topography and special features of a community.

J-8 Land Use Consistency – The draft EIR should address the significant changes in land use that could occur within a number of communities as a result of the adoption of this proposal. Within Rancho Bernardo, the Neighborhood Village Center and Future Villages and Transit Corridors designations are being applied to sites for which the currently adopted community plan discourages residential development. The Community Plan states that residential uses should not usurp land needed for commercial use. Further, the plan warns that residential development of these sites could strain the community roadways and other public services. The current proposal is inconsistent with our adopted plan. Although no significant impacts may ultimately occur as a result of the proposed change in use, the draft EIR should describe all such changes in order to fully inform the public and the decision-makers of the ramifications of the proposal on the various community planning areas.

Attachment 2 (Community Plans – Environmental Goals and Policies) must be amended to include the environmental goals and policies of the Rancho Bernardo Community Plan.

3. Noise

J-9 The list of sites that may be subject to traffic noise impacts (page IV-57) fails to include the proposed village sites in Rancho Bernardo, Rancho Penasquitos, and Sabre Springs, all of which are located immediately adjacent to I-15. The draft EIR should address the following questions: What are the anticipated noise levels to these sites? Can this noise be attenuated through the use of special construction materials, or based on projected noise levels; is it probable that noise attenuation walls will be required?

If noise attenuation walls would most likely be required, the draft EIR should also address the visual impacts of constructing noise walls along I-15 in these areas. Visual impacts should take into account not only the appearance of the walls from views to the freeway, but also the loss of views from the freeway.

4. Storm Water/Water Quality

J-10 Please indicate where in the Strategic Framework Element or the Action Plan there are specific requirements related to low water use, drought tolerant trees, minimal lawn areas, etc. The Board finds many “encouraging” words, but no requirements. How does this limited and unsubstantiated discussion under impacts address the three issue statements presented at the beginning of this impact section? Without specific standards and a method for enforcing those standards, it must be assumed that the impact of additional development throughout the City to water quality is at a minimal potentially significant. If there are standards in place, they should be described in detail. In addition, an explanation should be provided of how adherence to these standards would avoid significant impacts. If no

STAFF RESPONSE J-8: Comment noted. No significant changes in land use will occur as a result of the adoption of this proposal. See previous Staff Response J-2. Attachment 2 will be revised to include the environmental goals and policies of the Rancho Bernardo Community Plan.

STAFF RESPONSE J-9: The distributed DEIR states on page IV-57 that “potential village sites along area freeways may experience significant noise levels; it should be noted that elevated sites above busy roads and freeways would be subject to higher exposure than those below the roadway.” Mitigation discussion of noise section in the distributed DEIR (p. IV-58) discuss possible measures to reduce significant noise impacts and stated that noise impacts on the residential component of a mixed use development be more easily mitigated through site design; the non-residential component can be used as the noise barrier. Refer to previous Staff Response B-47.

Discuss of visual effects of specific noise walls along I-15 would be too speculative and beyond the scope of this programmatic, policy-level EIR addressing a proposed strategy to guide future growth and development, without any land use changes.

STAFF RESPONSE J-10: The proposed Strategic Framework Element includes general policy recommendations to guide the development of more specific requirements and related to low water use, drought tolerant trees, minimal lawn areas, etc. in the Conservation Element and its implementing regulations. The Action Plan has identified adoption of an updated Conservation Element as a priority item, and further, calls for the development of energy conservation and efficiency programs and the adoption, amendment and/or enforcement of City policies, regulations and programs to decrease storm water and urban runoff pollution. A list of specific amendments, programs, and strategies is included as part of those action items. The City of San Diego has committed to beginning an update of the Conservation Element, as a condition of its storm water permit, upon adoption of the Strategic Framework Element. *Ditto.*

standards are provided in the proposal, then specific mitigation measures should be recommended that could be incorporated into the General Plan Element.

5. Recreational Facilities

J-11 As is the case in other sections of this document, the impacts analysis for recreational facilities fails to provide a comprehensive analysis of the potential impact of this proposal on the various communities within the City. The impact discussion is limited to the urban core, and although we acknowledge the very significant need for additional active parkland in the urban core, there are also needs within other areas of the City and these too must be evaluated. The Rancho Bernardo Community Plan (page 66) identifies the need to expand our community park to serve the current population. Increasing the population of Rancho Bernardo will also increase the need for additional parkland. As in many other communities throughout the City, there is a significant need for more ball fields. These fields are needed to accommodate a wide variety of organized sports, with participants of all ages. Additional housing will generate additional demands for playing fields, recreational centers, and other types of recreational facilities.

J-12 The impacts to each community should be evaluated based on the current general plan standard of 20 acres per thousand people, even if none of the communities currently achieve the standard. This would allow each community to better understand the degree of impact that the proposed increase in population would have on its ability to achieve this standard.

J-13 The mitigation section should include feasible solutions to this need for active recreational areas. Increasing the densities in our communities will only increase the need for such areas. Innovative designs, such as developing recreational fields above parking areas, as has been done at San Diego State University and is currently under construction at UCLA, can produce large multiple use playing fields. Perhaps there are similar opportunities for the development of regional recreational fields at the stadium, above freeways, or in association with commercial parking areas. Although costly, these are feasible alternatives to reducing standards and should therefore be explored. Reducing the standards is not mitigation, as it doesn't reduce the need.

J-14 Finally, the open space areas that have been placed within the MHPA are intended to preserve significant biological resources, not to satisfy the City's need for additional active recreational areas. Therefore, these lands cannot be offered as mitigation for impacts related to recreational facilities. If there are no options and standards must be reduced, than the impacts from this proposal on recreational facilities should be described as significant and unmitigated.

6. Growth Inducement

J-15 Although the draft EIR determines that the proposal is growth inducing, it does not provide any information regarding the projected need for housing and whether or not the range of 17,000 - 37,000 units simply meets or actually exceeds the projected demand. The degree to which this proposal is growth inducing is directly related to this determination and should be provided.

STAFF RESPONSE J-11: Comment noted. Refer to previous Staff Responses to B-50, B-51, and B-54.

STAFF RESPONSE J-12: Comment noted. Language has been added to explain the current general plan standards with respect to active use park acreage. The current general plan also directs that while the standards are important, "they should be used with discretion rather than mechanically. They are only a basic tool for guiding and evaluating the adequacy of service to a given area and the City as a whole."
Ditto.

STAFF RESPONSE J-13: Comment noted. Neither the strategy nor the DEIR propose to reduce standards. Language has been added to DEIR to specify how creative ways can be used to meet current standards. The Strategy and Action Plan both call for the development of a Park Master Plan that includes a needs assessment and implementation strategies to address inequitable access to recreational resources. This will include the expansion of options, such as those mentioned by the author of this comment, for how communities can meet park and recreation standards in new and untraditional ways. Project specific park and recreation impacts will be discussed and mitigation proposed at the time of designation of specific village sites. This will most likely occur through a community plan update/amendment process.

STAFF RESPONSE J-14: The distributed DEIR does not suggest that lands within the MHPA will satisfy the City's need for active recreational areas. It states that some urban canyons can be used in limited, passive ways to meet resource-based park needs. The current general plan recommends the provision of a range of opportunities for active and passive recreation activities tailored to each community.

STAFF RESPONSE J-15: Refer to previous Staff Response to J-4

7. Neighborhood Character and Aesthetics

J-16

This proposal would result in increased densities throughout the City that without adequate design standards and oversight could significantly alter the neighborhood character and aesthetic quality of a community. This is particularly true in communities that have very few, if any, buildings that exceed three stories in height. In these cases, the character of the community will necessarily be altered. This change in character may ultimately be determined to be less than significant, but until more information is available, it cannot be assumed that all such alternations in community character will be insignificant.

Until design standards are developed and their implementation is assured, it is not possible to find that intensification of residential development within a community is less than significant, particularly at the Program EIR level. This issue should be moved to Chapter 4, where a more comprehensive analysis of potential impacts can be provided.

8. School Facilities

J-17

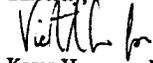
What is the expected student generation rates from these types of development? How will this increase in students over that currently projected by the affected school districts impact the ability of schools to serve the needs of children within the district? The statement on page VII-2 that reads "due to the long-term nature of the potential growth, the City and the school districts will have sufficient time to plan for additional school related facilities," is an unacceptable way of addressing potential impacts. How can the districts plan for this growth if the draft EIR does not even attempted to describe the magnitude of the growth?

J-18

The members of the Rancho Bernardo Community Planning Board found it very difficult to evaluate the effects that this proposal could have on our community and the City as a whole due to the lack of comprehensive impact analysis throughout the document. We hope the City will take the time to address these issues and recirculate the revised draft EIR for public review. In that way, we can make an informed decision regarding the potential for positive and negative impacts to our community as a result of implementing the City of Villages proposal.

We appreciate this opportunity to provide comments.

Sincerely,



Karen Heumann, Planning Board Chair

STAFF RESPONSE J-16: The commenter is not entirely correct to generally assert that the project "would result in increased densities throughout the City". The proposed strategy to guide future growth and development would not result in any land use change; so, no increased densities would directly result from the approval of this proposed strategy. Also refer to previous Staff Response B-27. The resulting increased densities through subsequent community plan updates or amendments, if fully implemented, would occur throughout the City; however, it should be qualified that potential village locations would be on non-residential areas generally along major roads or the I-15 corridor.

It is possible for the distributed DEIR to determine that the proposed strategy would not pose a significant effect on neighborhood character at this programmatic, policy level, because the proposed strategy does not result in any land use change and it preserves existing single-family neighborhoods. Also refer to previous Staff Responses B-5 (Paragraph 1) and B-26.

STAFF RESPONSE J-17: The largest potentially effected school district would be the San Diego Unified School District. The district uses a generation rate of 0.1 student per attached unit. The application of this rate to the 17,000 to 37,000 units citywide over the next twenty years without specific location or density would be meaningless and any interpretation of the results would be speculative at this programmatic, policy-level analysis. Potential impacts to schools would be considered again for significance at the more appropriate community level when community plans are subsequently updated or amended. Also refer to previous Staff Responses B-58, B-59, and B-62 (Paragraph 3).

STAFF RESPONSE J-18: The distributed DEIR has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization. The DEIR appropriately focused impacts on a citywide and/or regional basis and due to the features of the proposed strategy, did not need to address effects on a community level as suggested by the commenter.

Scripps Ranch Planning Group

Attn: Bob Ilko, Chairman
10247 Rue Touraine
San Diego, Ca. 92131

CITY OF SAN DIEGO

MAR 27 2002

PLANNING DEPARTMENT

March 22, 2002

Mr. Lawrence C. Monserrte, Assistant Deputy Planner
Development Services department
City of San Diego
202 C Street
San Diego, Ca. 92101

Re: Draft EIR City of Villages Growth Strategy- Strategic Framework Element

Dear Mr. Monserrte:

We, the Scripps Ranch Planning Group (SRPG), appreciate the opportunity to forward our comments to you on the City of Villages Draft Environmental Impact Report (DEIR).

General Comments

The SRPG generally was of the opinion that The City of Villages is a good plan to guide some of our future growth. Building high-density projects in mixed-use arrangements close to public transit nodes has much merit.

The SRPG also had many concerns about the approach and the DEIR. The City of Villages strategy can probably only be pursued in limited locations and, therefore, is not a comprehensive growth policy at all. Other growth strategies must be designed to accommodate other types (most types) of growth. Public transportation should be in place before the development occurs and these improvements should include both public transit and automobile transportation. The proposed world-class transportation system should recognize the automobile and include improvements to better accommodate it. The history in San Diego with mass transit leaves us questioning whether a world-class transit can be provided to the selected sites in a timely basis and, yet without world-class transit, the entire Strategic Framework Element concept doesn't work.

We want the development of The City of Villages to be methodical and thorough. Public expediting of these projects should not be a major consideration- rather broad and thorough public planning and review should be a paramount consideration. Managed and directed development that respects the quality of life is our goal.

STAFF RESPONSE K-1: The proposed Strategic Framework Element provides direction to meet housing and employment needs and to preserve and enhance San Diego's neighborhoods, both through its proposed City of Villages strategy and policy recommendations. Although the City of Villages strategy is more specific in recommending potential locations for targeting future increased density, the policy recommendations (Urban Form, Mobility, etc.) will direct the updates of all of the elements of the current Progress Guide and General Plan, which guides citywide development. The proposed 5-Year Action Plan, which provides an implementation strategy for the Strategic Framework Element, also includes a number of recommendations that address citywide development.

Disagree with the commenter's contention that potential limited implementation of the proposed City of Villages strategy deems the strategy as "not a comprehensive growth policy at all". As stated in the proposed Strategic Framework Element, this strategy is a plan for the next twenty years and beyond; while there may appear to be limited areas where the potential villages could be developed in the near term, as the housing needs become more critical and the pilot villages demonstrate the viability and attractiveness of a compact, mixed use development with urban amenities, walkability and transit accessibility, the lure of village-type redevelopment and infill projects would become a desirable and, more importantly, a more marketable option for growth.

The Metropolitan Transit Development Board (MTDB) approved the Transit First vision on October 26, 2000, followed by approval of an overall implementation plan on November 9, 2000. One of the key elements of the implementation plan is to work with SANDAG to identify funding to implement the Transit First vision. An important step to obtain funding is to include the Transit First network of projects in the 2030 Regional Transportation Plan (RTP). This has been prepared as a draft Regional Transit Vision. The 2030 RTP, which will incorporate the Regional Transit Vision, will form the basis for developing the program of projects for a TransNet reauthorization measure.

In addition, MTDB is pursuing the development of Showcase projects (pilot transit projects) designed to illustrate the full Transit First experience in selected locations over the next 3-5 years. Funding for the implementation of Showcase projects, as well as the entire Transit First network, will necessarily come from a variety of local, state, and federal sources. As funding is secured, improvements will be phased in over time. The rate of implementation will depend upon the willingness of San Diego taxpayers to fund the program, the availability of state and federal funds, the success of transit/land use integration efforts, walkable community design improvements, and implementation of transit priority measures.

Refer to previous Staff Response B-25 regarding community input in the subsequent community plan update or amendment process to implement the proposed City of Villages strategy.

K-1

Page 2
City of Villages DEIR
March 22, 2002

K-2

As far as the potential for a City of Villages in Scripps Ranch is concerned, there is no strong support within the SRPG on the suitability of any of the three sites shown on the Draft City of Villages Map. Problems concerning all three selected sites were discussed, with off-site traffic impacts being the major concern at all sites. The arbitrary assignment of residential densities to these sites could be a potential impediment to good planning. For example, some interest in the Community has been expressed in senior housing and assisted living and whether these can fit into the prescribed density ranges has yet to be determined.

Specific Comments

1. Neighborhood Village Centers -- Page III-3

K-3

Neighborhood Village Centers should be a minimum of 10 acres, not the three acres proposed. Ten acres should be about the minimum size necessary to have the right economies of scale and market impacts.

2. Housing Affordability- Page III-7

K-4

Geographical diversification must be weighed against the economics of achieving such balance. For example, building a few costly moderate-income units in LaJolla must be weighed against building more units in say Serra Mesa where the development costs are much lower.

3. Streamlining Development Regulations-III-8

K-5

The review of the City of Villages proposals should require and support maximum public input. Streamlining the processing of a City of Villages project at the expense of the appropriate public input should not be done.

4. Neighborhood Quality- III-9

K-6

All stakeholders, not just the builders, should share in the cost of any inclusionary housing program. The cost of inclusionary housing is too high for any one party to finance alone.

STAFF RESPONSE K-2: Comments noted; these comments do not address the adequacy of the distributed DEIR. As previously stated, the proposed strategy result in no direct land use changes or specific location of villages.

STAFF RESPONSE K-3: Comments noted; these comments do not address the adequacy of the distributed DEIR. The broad range in acreage recommended for the potential Neighborhood Village Centers is intended to provide flexibility in tailoring potential village sites to individual communities as they are considered in subsequent community plan amendments and updates. This flexibility allows communities to include smaller sites that could function as Neighborhood Village Centers in their plan updates, particularly in the more urbanized portions of the City.

STAFF RESPONSE K-4: Comments noted; these comments do not address the adequacy of the distributed DEIR. The proposed City of Village strategy is intended to increase affordable housing opportunities throughout the city. The subsequent update of the Housing Element will further address this issue in more detail.

STAFF RESPONSE K-5: Comments noted; these comments do not address the adequacy of the distributed DEIR. As referenced in the proposed 5-Year Action Plan, the proposed permit process streamlining is not intended to reduce public input, but rather to reduce inefficiencies that are created through City structure and organization processes and through existing regulations. In fact, a key recommendation in the Action Plan is to increase community input and partnerships in the planning process. This recommendation will be a critical component in identifying and developing villages.

STAFF RESPONSE K-6: Comments noted; these comments do not address the adequacy of the distributed DEIR. The proposed Strategic Framework Element does not recommend specific funding sources for an inclusionary housing program. It should be noted that the Housing Commission is currently in the process of developing an inclusionary housing program that recommends funding from multiple sources.

Page 3
City of Villages
March 22, 2002

5. Inconsistency- IV- 20

K-7 | The wholesale reduction of parking requirements for projects near transit should be done very cautiously, ensuring that there is in fact, less cars being owned and driven by these residents. Most experience here in San Diego shows that parking standards in many past projects have not been adequate.

6. Significance of Impacts-Page IV-32

K-8 | The projected housing deficit covers such a wide range (17,000 units to 37,000 units) as to make the projection's accuracy suspect.

7. Cumulative Impacts- Page VI-17

K-9 | What Pomerado Road Community Plan Amendment is being proposed?

8. Draft 4 DEIR Map

K-10 | SRPG does not endorse any site or proposed density indicated on the draft map. Further, we recommend that sites and land uses be developed through a close dialog between the City and the communities. For example, SRPG has identified an interest in senior housing and senior assisted living projects.

9. City of Villages Overview

K-11 | In the Strategic Framework Element, the City of San Diego seeks to greatly expand its role as a development agency with far-reaching authority to determine land use. If development at the prospective sites (such as those identified on the map that accompanies the DEIR) is imposed by the City, individual communities will lose control of their destinies. The SRPG does not endorse any site generally designated by the Framework Element or specified in the DEIR. Rather, we recommend an on-going dialogue between the City and the communities that provides for the best input and results in the best land uses to address our future needs.

K-12 | The Plan does not address what happens to growth after 2020. The City of Villages can satisfy some of the region's needs, but how will other growth needs be satisfied? Surely, the City of Villages will not accommodate all our growth needs.

STAFF RESPONSE K-7: The proposed strategy would not result in a "wholesale reduction of parking requirements". Refer to previous Staff Response A-6.

STAFF RESPONSE K-8: The environmental analysis in the distributed DEIR assumed that the 17,000 to 37,000 attached homes would be built out by the year 2020, but the proposed strategy may be appropriate for beyond the typical twenty-year, planning horizon. This beyond 2020 scenario is described in the proposed draft Strategic Framework Element. The draft Element estimates that "certain areas will begin to develop some of these (village) characteristics within the next ten to fifteen years but will not reach their full potential until after 2020."

STAFF RESPONSE K-9: Comments noted; these comments do not address the adequacy of the distributed DEIR. The cited environmental analysis that was conducted for a previously proposed community plan amendment. This proposed strategy is not proposing a community plan amendment regarding Pomerado Road; as stated previously, there are no proposed land use or circulation element changes with this proposed strategy to guide future growth and development..

STAFF RESPONSE K-10: Comments noted; these comments do not address the adequacy of the distributed DEIR.

STAFF RESPONSE K-11: Comments noted; these comments do not address the adequacy of the distributed DEIR. As previously stated, the proposed strategy result in no direct land use changes or specific location of villages. Also refer to previous Staff Response B-25 regarding community input in the subsequent community plan update or amendment process to implement the proposed City of Villages strategy.

STAFF RESPONSE K-12: Comments noted; these comments do not address the adequacy of the distributed DEIR. Refer to previous Staff Response K-8.

Page 3
City of Villages
March 22, 2002

10. Housing Affordability

K-13 | We support affordable housing that does not sacrifice the City's quality of life.

11. Transportation

K-14 | The draft EIR does not adequately address how the Strategic Framework Element would be consistent or inconsistent with other Elements of the City's General Plan, notably the Circulation Element.

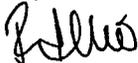
K-15 | The DEIR does not address the worst-case scenario, which would be if the land uses were implemented and the world-class transit system proposed was not implemented.

K-16 | The DEIR should also include a detailed traffic impact study of all the specific proposed sites identified in the Draft 4 DEIR map. This study is lacking.

K-17 | The SRPG applauds the Planning Department and The City of San Diego for showing the initiative and foresight in setting The City of Villages as a guide for our future. However, we believe more work needs to be done to develop a truly comprehensive and realistic growth framework for the entire City of San Diego. We look forward to contributing to this effort.

Thank you for considering our comments.

Sincerely,



Robert Ilko
Chairman, Scripps Ranch Planning Group

STAFF RESPONSE K-13: The commenter's cited balance is the challenge as well as the intent of the proposed City of Villages strategy. Refer to previous Staff Response B-15.

STAFF RESPONSE K-14: The proposed project, the strategy to guide future growth and development, would not result in any landuse or circulation element change; the analysis was based on the adopted circulation. Therefore, the distributed DEIR did not need to address the consistency with the Circulation Element. It should be noted that the proposal once adopted, sets in motion the updating other the other elements of the City's Progress Guide and General Plan; this is disclosed in the proposed 5-Year Action Plan.

STAFF RESPONSE K-15: The commenter's suggested "worst-case scenario" would not change the traffic impact determination in the distributed DEIR. Transit improvement were modeled with the project's total vehicle trips and showed only partial vehicle trip reduction (revised to 4%); the traffic impacts were determined to be significant and unmitigated.

STAFF RESPONSE K-16: As previously stated, he proposed strategy to guide future growth and development, would not result in any landuse or circulation element change. Subsequent community plan amendments or updates would site specific village locations and designate land use intensities. With this community-level information, a second-tier environmental review must occur; this review would include the commenter's cited "detailed traffic impact study". Therefore, the distributed, program-level DEIR could not and did not need to address specific, localized traffic effects.

STAFF RESPONSE K-17: Comments noted. Refer to previous Staff Response K-1 (Paragraph 2).

Serra Mesa Planning Group

2505 Mammoth Drive
San Diego, CA 92123

Lawrence C Monserrate, Assistant Deputy Director
Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

March 10, 2002

RE: Draft Environmental Impact Report- The City of Villages Growth Strategy –
Strategic Framework Element - Comments on Adequacy

Dear Lawrence Monerrate:

On March 4th, a SMPG committee met to discuss the DIER for the City of Villages. The vision of the Strategic Framework is clear. While very little of the document applied directly to Serra Mesa, the following are the general concerns that were expressed:

- L-1 1. The specifics of the Project and of what the DIER was to address were not clear. What was the basis for arriving at the number of units (17,000 to 37,000) for the City of Village Project? Are these proposed units in addition to or part of what the existing community plans could or are already proposing? In what communities are the additional units being proposed to be built? The attached City of Village Map showed no specific names or identifications. Will neighborhood village centers not included in this draft proposal be excluded from transit first and city of village strategies? Are all designated village centers included in this strategy? How will the designated existing village centers that are now being proposed for housing developments be protected so that the necessary villages amenities are included in the redevelopment? What will be the impact of the demolition of existing retail/ businesses/offices in regard to employment and services?
- L-2 What is being proposed as employment centers for work opportunities for the proposed new growth? Are any provisions being considered for after the year 2020?
- L-3 2. Inaccuracies about Serra Mesa that were found in the DIER need to be corrected.
 - Environmental Setting (Section II-1) Serra Mesa should be included with "mesa communities" listed in the Linda Vista Terrace.
 - Table II-1: CENSUS DATA (Section II – 3) The 2000 census data for Serra Mesa is 26,323 not 19,314 as shown on the chart. This would change the minus 27% growth from years 1990 to 2000 and the projected percentage change to the year 2020. Serra Mesa's population is not decreasing to the extent shown. Our population appears to have stabilized. It has been indicated that according to our community plan as of 1998, Serra Mesa has an excessive capacity for growth; we have population capacities above our
- L-4

STAFF RESPONSE L-1: Refer to previous Staff Response B-33. The current proposed strategy is solely the consideration of a strategy to guide future growth and development; the number of additional attached units and where these units would be built will be decided by subsequent community plan amendments or updates; there are no "designated villages" only potential ones with this proposal. Communities who do not wish to include potential villages would not benefit from the City of Villages strategy; transit improvements in these communities would depend on current and projected residential densities and or employment opportunities. For Serra Mesa, SANDAG's 2020 forecast showed no expected commercial growth to the year 2020 and an increase in industrial land to 2005 but no increase thereafter; during this same time period, the residential density is expected to remain a relatively low 8.3 dwelling unit per acre. The potential village centers at existing shopping centers will retain their commercial uses and zones; the mixed-use attached residential components would be added and essentially be auxiliary uses to the commercial/retail/office uses. Larger parking areas could be parceled out and rezoned for multi-family residential.

STAFF RESPONSE L-2: There may be a demolition of older "retail/businesses/offices" as a result of redevelopment, but the proposed strategy would allow more intensive commercial/ employment uses with an added mixed-use residential use component. It is not the intention of the proposed strategy that within potential villages, attached residential uses entirely replace existing commercial uses. In some viable, existing commercial areas, the potential attached units may replace the large open parking area and engender the construction of shared parking structures. The possible compact, mixed use villages would include intensified employment opportunities through higher floor area ratios, building height, and/or lot coverage. While the distributed DEIR assumed for impact analysis purposes that buildout of the 17,000 to 37,000 units in potential villages would occur by year 2020, the proposed City of Villages strategy is expected to guide growth and development past 2020. In addition, the proposed Strategic Framework Element contains a "Beyond 2020" discussion.

STAFF RESPONSE L-3: The text of the Final EIR has been revised to include Serra Mesa as a mesa community.

STAFF RESPONSE L-4: It is unclear where the commenter obtained the census data for Serra Mesa which shows 26,323 population count in 2000. The updated 2000 census data from SANDAG shows 22,873 for Serra Mesa; this is still a 2.5% decrease from 1990. Contrary to the commenter's assertions of "excessive capacity for growth", SANDAG 2020 projections (which has been reduced by the preliminary 2030 projects) show a two percent growth in housing units in Serra Mesa over the next eighteen years and identifies no developable residential acreage; the population has stabilized.

2000 census population. If this is correct, what significance does this have for Serra Mesa and the City of Villages' proposal?

- L-5 -----Attachment 2 – Community Plans– Environmental Goals and Policies (page 10 of 24) Serra Mesa's Community Plan's Environmental Management Element was updated in 1999 and adopted by the City Council in 2000. The community's old goals should be replaced with our new objective and proposals. "To designate multiple species conservation areas, canyons and hillsides for preservation as open space and for strictly controlled utilization for the enjoyment of this generation and in perpetuity."

3. Additional information is needed.

- L-6 City of Villages - List of Land Use Categories by Community
Acreages and "possible" units for each District, Urban Village, and Neighborhood Center
Resident Densities by Community

- L-7 Present Community Plans' Capacity or Incapacity for Growth – the amount of residential, commercial and industrial development that could be available.

- L-8 Specifics of the Five Year Plan

- L-9 Glossary of Terms – transit first, tandem parking, transit overlay zones, transit orientated development (TOD), etc.

- L-10 Examples of innovative and creative projects that could be used as models for design standards for mixed use projects of medium densities in residential neighborhoods.

- L-11 When will "world class" public transportation be in place? How will transit be guaranteed and subsidized?

- L-12 Will the new housing impact fees pay for the needed infrastructure or will other funding sources be needed? What funding sources have been or could be identified to pay for existing and future needs such as maintenance for streets, sewer, parks, libraries, and police/fire protection?

- L-13 What is the current housing inventory? What is the average of new housing units built each year and what is proposed for the next five, ten, and 20 years? What is the proposed number of housing units to be developed on aging shopping centers? What changes in zoning and regulations are being considered to maximize the units allowed for increased densities? What is the inventory of aging shopping centers and other land areas that are proposed for infill? How does the change in population demographics affect housing?

4. Quality of Life should be preserved and enhanced in our neighborhoods.

- L-14 More density/housing should be exchanged for better streets, parks, and public facilities. The quality of life for communities should be enhanced; therefore design standards, park and recreational requirements, parking requirements should not be adjusted, changed, or altered. High standards should be maintained and required. The neighborhood's unique character must be protected. Parking requirements for higher density developments should not be reduced; less driving does not reduce the need for parking spaces for cars. Tandem parking and transit overlay zones should not be imposed on any neighborhood center or community area unless the community proposes to change their Community Plan. Parkland space requirements should not be changed. Higher density requires more parks and open space not less.

STAFF RESPONSE L-5: Comment duly noted.

STAFF RESPONSE L-6: The proposed City of Villages strategy does not result in any land use change or designate any village location. Refer to previous Staff Response B-16.

STAFF RESPONSE L-7: The distributed DEIR considered a citywide strategy to guide future growth and development and the commenter's requested level of detail is not pertinent to the required focus the DEIR analysis. This especially the case for the proposal which would not directly result in any land use change and the stated phasing which would require subsequent community plan amendments or updates to implement the proposed strategy, if adopted.

STAFF RESPONSE L-8: The commenter's requested specifics are included in the separate implementing document, the propose 5-Year Action Plan; this planning document was distributed along with the DEIR for public review. A summary of this plan was included in the distributed DEIR.

STAFF RESPONSE L-9: The distributed DEIR adequately described MTDB's Transit First Plan. "Tandem parking" and "transit overlay zones" are not pertinent to this EIR's analysis of the proposed growth strategy. The TOD Design Guidelines are described in the text of the proposed Strategic Framework Element. These TOD Guidelines are proposed to be applied to potential village and corridor on an interim basis. These guidelines would require transit oriented design features for discretionary projects; they would not result in any land use change.

STAFF RESPONSE L-10: Examples of villages and corridors are listed in the proposed Strategic Framework Element. Downtown is and will continue to be the regional center. Subregional Districts include Mission Valley and Otay Mesa. Hazard Center is an Urban Village Center. The Uptown area is a Neighborhood Village Center. El Cajon Boulevard and Garnet Avenue are the commercial "main streets" that can be revitalized as Transit Corridors.

STAFF RESPONSE L-11: Refer to previous Staff Response B-7.

STAFF RESPONSE L-12: All new subsequent development pursuant to the City of Villages strategy would be required to pay impact fees; there may be opportunities for the City to coordinate the scheduled upgrades of sewer and water lines to coincide with future village development. Refer to previous Staff Response A-7 regarding possible funding sources.

STAFF RESPONSE L-13: The 2000 Census shows 469,689 total housing units in the City of San Diego. The average number built each year is about 4,000 units. The proposed City of Villages strategy does not "propose" any rate of new units in the future or rezonings. The several "aging shopping centers" are shown on the draft City of Village maps as potential or future village sites. If the commenter's "change in demographics" refer to the aging population, the proposed strategy would allow independent, mature people who no longer need or want their attached home but wishes to continue to live in the same community, to sell their home and live in a smaller, attached home in a compact, mixed use village closer to shopping, services, and public transit.

STAFF RESPONSE L-14: Comments noted. Refer to previous Staff Response B-15.

L-15 5. The "proposal" will result in land use which is inconsistent with the adopted Serra Mesa Community Plan's designations for the Mission Village Shopping/Office Centers and the Serra Mesa Shopping Center. These centers are not designated for any residential use. If these centers are considered for residential and mixed use, a community plan amendment would be needed. The loss of retail, services, and employment at these centers will have significant negative impacts on the residents. It will force residents to go outside the community for services and make them auto dependent. It is clear that the adopted Serra Mesa Community Plan did not anticipate residential development at our shopping and office centers.

L-16 6. The "proposal" could result in bulk, scale, materials, or style, which will be incompatible with Serra Mesa's surrounding development. If proposed housing units are buildings more than two stories in height, this will be incompatible with present height of the houses and apartments surrounding the centers. Changing the community's designated shopping centers to residential centers of more than two stories would drastically alter the existing character of the area.

L-17 7. Densification next to our single-family and multi family homes will impact the neighborhood with on street parking problems and traffic. It will impact our parks, schools, and fire/police protection. Congestion on Ruffin Road and Mission Village Drive is getting worse everyday, as these Serra Mesa streets have become the alternative route for I-15 to Friars Road and the freeways.

L-18 Thank you for this opportunity to review and concur with your conclusions that the projection of 17,000 to 37,000 housing units will have significant environmental impacts for San Diego and Serra Mesa in the areas of transportation, air quality, recreational facilities, solid waste, and disposal of hazardous materials.

Sincerely,



Mary Johnson, Chair
SMPG Redevelopment Committee

CC: The Honorable Councilperson Donna Frye
The Honorable Mayor Dick Murphy

STAFF RESPONSE L-15: Comments noted. Please note that with the 4th draft City of Villages map included in the distributed DEIR, all potential villages have been removed from the Serra Mesa Community Plan Area. So, the possibility of the commenter's asserted inconsistency has been removed from current or near-term consideration; no change in land use or added growth would occur in Serra Mesa without a subsequent plan amendment. Also refer to previous Staff Response L-2.

STAFF RESPONSE L-16: Refer to previous Staff Response L-2.

STAFF RESPONSE L-17: Refer to previous Staff Response L-2.

STAFF RESPONSE L-18: Comment noted.

**SORRENTO HILLS COMMUNITY
PLANNING BOARD**

4542 CALLE MAR DE ARMONIA
SAN DIEGO, CA 92130
(858) 755-3392

CITY OF SAN DIEGO
MAR 25 2002
PLANNING DEPARTMENT

March 19, 2002

Mr. Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Department
City of San Diego
1222 First Avenue, M.S. 501
San Diego, CA 92101

**SUBJECT: "THE CITY OF VILLAGES GROWTH STRATEGY -
STRATEGIC FRAMEWORK ELEMENT DEIR"
(LDR No. 40-1027/SCH No. 2001061069)
To Replace "Guidelines for Future Development"
in the City of San Diego Progress Guide and General Plan**

Dear Mr. Monserrate:

M-1 The success of a better "villages" planning strategy depends completely upon a community's ability and desire to incorporate more density and development mix. Our community plan has already absorbed 25% more residential development through plan amendments than what was planned when it was implemented in 1997. We are already at capacity since it is accepted by the City that many of our streets must operate at LOS D.

M-2 Many older neighborhoods have long harbored ill will toward City policy which denies them a direct role in solving growth and traffic problems. Each neighborhood should be treated distinctly. Recently planned/developed communities and older communities have different infrastructure needs and planning principles in place. What might work in terms of densification in Barrio Logan will not work in Torrey Hills which is already densified. San Diego's communities all recognize their uniqueness and mutually respect individual community histories and character. Certain overall City policies (such as open space preservation, canyon preservation, improvement of watershed quality) have been uniformly

STAFF RESPONSE M-1: Comments noted. Community acceptance and input are integral to the subsequent implementation of the proposed City of Villages strategy.

STAFF RESPONSE M-2: Comments noted. It should be noted that commenter's choice of comparison to Barrio Logan in conjunction with the assertion that Torrey Hills "is already densified" is somewhat unfortunate. SANDAG data show that while Sorrento Hills Community Plan Area has a relatively low density of 7 dwelling units per acre reflecting its single family character, Barrio Logan has a current, relatively higher density of 25 units/acre depicting its equal mix of single and multi-family housing units.

The proposed Strategic Framework Element is a citywide strategy to guide future growth and development; like the commenter's cited "open space preservation, canyon preservation, improvement of watershed quality", this proposed strategy is also a policy which applies uniformly citywide. Its implementation would involve community input; the envision remains appropriately citywide. At some point in the maturing of new North City communities, the strategy would become more applicable.

accepted by all communities. Solving a community's growth problems, however, has been recognized as best left to the individual community. While this Board fully supports redevelopment efforts in older areas of San Diego, it is not necessary or appropriate for our community.

M-3 As communities are asked to incorporate more density, the existing shortage of public facilities is made even more apparent. In our case, when the community was master-planned, the level of public facilities included was based on the planned densities. If we are asked to intensify, how will the required public facilities, such as population-based, active-use parks, or roads, or schools be funded? Where will the land for these facilities be found?

M-4 The Draft EIR emphasizes that community plans will be revised to conform with the PG & GP. This is not our intent when we are asked to accept a policy to accommodate a projected population increase from 1990 to 2020, building 17,000-37,000 new homes, and generating 240,000 additional travel trips on a city-wide highway/road system of which 77 miles currently operate at a failed LOS F efficiency.

Transportation/Circulation

The Draft EIR is patently clear about the unmitigated traffic impacts of adding 17-37,000 more housing units to what is currently planned city-wide:

"The proposed project combined with regional efforts by SANDAG and MTDB's Transit First program could encourage the additional residents...to choose alternative less impactful, transportation modes....HOV facilities (etc.)...The modeling for the proposed City of Villages strategy showed a conservative limited effect of the proposed villages on its resultant increased walking and transit use. These measures are partial mitigation at best, and significant future traffic congestion impacts will not be reduced to below a level of significance."
(Introduction iii)

In fact, "the modeling indicated only about a six percent reduction in all travel trips attributable to transit use and walking."

M-5 It is deeply disturbing to read in this Draft EIR that even with an adopted "Transit First" policy, implemented with billions of currently unidentified dollars, traffic levels throughout the City will worsen from today's dismal standards, even though "the envisioned improved transit services is expected to result in significant gains." (I-3) It is critical that the public be fully informed if we as a City are to tackle growth at any level.

M-6 Under "Existing Conditions" many reviewers will hear for the first time what community planners have known for several years: Worsening traffic capacity of our roadway system and inefficiency of our transit system by the late 1980s led to a 1990 decision by the City Council ("Growth Management Program") to lower acceptability standards for all roadways. "The standard level was downgraded from LOS C to LOS D." (IV-23) The acceptable

STAFF RESPONSE M-3: The Sorrento Hills community is subject to development thresholds that have been applied through Development Agreements. In the case of roadways, development is tied to the phasing of transportation projects in the adopted public facilities financing plan for the community. The proposed City of Villages map depicted one, relatively small potential Neighborhood Village Center in Sorrento Hills and its subsequent implementation would require at least a future community plan amendment. Park needs attributed to a potential addition of attached units over the existing community plan's anticipated 2150 dwellings, would require developer contributions based on fair share criteria for population based parks. The potential village if selected, would result in a small increment of additional, attached units such that it would not require an additional park site to be obtained. Any inclusion of such additional units would necessitate a community plan amendment, requiring a public hearing. School fees would also apply on a per unit basis were the community plan and zoning amended at public hearing(s) to allow any added residential increment.

STAFF RESPONSE M-4: Comments noted. Community acceptance and input are integral to the subsequent implementation of the proposed City of Villages strategy. Also refer to previous Staff Response M-2 (Paragraph 2).

STAFF RESPONSE M-5: It should be noted that the modeling results have been revised; there would be nine percent, not six percent, of the total trips attributable to transit use, walking and bicycling. The DEIR determination regarding traffic remains unchanged; it remains significant and unmitigated.

The commenter is incorrect in asserting that "traffic will worsen throughout the City". The distributed DEIR disclosed that the regional freeway congestion as described in SANDAG's 2020 Regional Transportation Plan, would decrease from current 77 miles to 29 miles in the year 2020; this an expected improvement to the regional system. Also refer to previous Staff Response A-10.

STAFF RESPONSE M-6: It should be noted that the change from LOS C to LOS D was disclosed/analyzed in the 1990 EIR on the City's Growth Management Program (DEP EIR No.90-0526). This EIR in its draft form, was distributed to all community planning groups as well as interested parties within City and to state/federal agencies and adjoining jurisdictions.

"norm" for San Diego's roads now became "Extremely unstable conditions where maneuverability and psychological comfort becomes extremely poor... There is little choice in speed selection... Significant delays become possible..." (IV-22)

M-7 Throughout the 1990's development proceeded despite documentation that the roads in specific communities could not handle this traffic. The fallacy that needs to be corrected in the final EIR is that "improvements" in the State Route 56 - I-5 corridor will be improved with current planning. Unfortunately, the Draft EIR perpetuates the myth that once the SR 56 middle segment is completed and connected to the west and east ends, traffic will flow on both freeways and not impact the communities they bisect.

The Draft EIR (IV-27 and elsewhere) asks the question: "Issue 3. Will the proposal result in an increase in projected traffic which is substantial in relation to the capacity of the street system?"

The document first cites two northern I-5 segments as failed LOS F---I-5 at Del Mar Heights Road and I-5 between I-805 and Carmel Valley. These affect our community daily. To assess the impact of Issue 3, however, the Draft EIR repeats a fallacy our community would once and for all like to be excised: that "the completion of the middle section of SR-56 linking I-5 from Carmel Valley to Rancho Penasquitos" will raise the level of service in this transportation link. (IV-27)

M-8 "SANDAG's 2020 (RTP) (April 2000) estimates that there are 77 miles of a total of 616 directional-miles of freeways... within the region which are currently... operating at LOS F... With the following improvements, it is estimated that even with more people and more vehicles, the LOS F freeways and expressways in the year 2020 the deficient directional miles can be expected to be reduced to 29 miles... These needed improvements include:...(HOV) lanes on I-5 and I-15; Completion of the idle section of SR 56 linking I-5 with I-15 from Carmel Valley to Rancho Penasquitos."

SR 56 north of Torrey Hills at I-5 was determined to be a failed freeway upon opening day of its completion- from its EIR analysis, the I-5 Widening studies and environmental documents, and from all subsequent environmental analysis of project proposals. It is anticipated to operate at LOS F at I-5 from eastern approaches to this interchange. To date there are still no planned ramps from SR 56 west to north and from I-5 south-to-east and no funding for such ramps. LOS F traffic will build up throughout Carmel Valley from east to west, forcing traffic to use surface streets to access I-5, thus backing up down El Camino Real through Torrey Hills. (Caltrans models presented March 18, 2002)

M-9 Given this, the final EIR cannot be certified with the erroneous information that the unmitigated impacts of the "City of Villages" traffic increases may be improved with the completion of SR 56.

Recreational Facilities

M-10 The discussion of Multiple Habitat Planning Area (MHPA) is inappropriate and misleading in an evaluation of park and recreation facilities. (Page IV-94 - IV-96) The MHPA is

STAFF RESPONSE M-7: Refer to previous Staff Response A-14.

STAFF RESPONSE M-8: Refer to previous Staff Response A-14.

STAFF RESPONSE M-9: It should be noted that the regional freeway congestion as described in SANDAG's 2020 Regional Transportation Plan, would decrease from current 77 miles to 29 miles in the year 2020; this level of congestion is expected to occur with or without the traffic contribution of potential, resultant attached units of the proposed City of Villages strategy. However, for CEQA purposes this incremental contribution by the potential traffic from the proposed strategy would add to a congested freeway system in the year 2020, an expected, significantly impacted condition; therefore, although the project's impact is relatively small and incremental; it must be determined to be partially mitigated and, therefore, significant and unmitigated.

STAFF RESPONSE M-10: The discussion of MHPA and MSCP included in the distributed DEIR is appropriate for the proposed strategy to guide future growth and development because the City's adopted planned preserve plan defines large areas at the northern, eastern and southern portions of the City where portions would be either preserved as open space or limited to 25% development areas. The MSCP/MHPA defines the boundaries of the City of San Diego. In addition, the MSCP was mitigation for future growth of the City as well as surrounding jurisdictions, adopted with the approval of the expansion of the Metro Wastewater System. It mitigates impacts to sensitive species and habitat posed by the expected growth within the southern subregion of San Diego.

It should be noted that many isolated urban canyons were credited as MHPA; a map depicting these MHPA canyons was included in the distributed DEIR.

intended primarily as a preserve for biological resources. The final EIR should quote directly from the *PG & GP*:

"This category includes areas that have been designated for long-term open space use primarily because of their value in protecting landforms; providing buffers within and between communities or potentially incompatible land uses; providing visually appealing open spaces; and protecting habitat and biological systems of community importance that are not otherwise included in the (MSCP) Open Space category. Most of this open space has been designated in adopted land use plans for many years..."

M-11 According to the MSCP Subarea Plan (page 44) passive recreation is considered a compatible land use. However, the overwhelming need of the Torrey Hills community is active recreation facilities. As discussed in the City's Progress Guide and General Plans, these active recreational needs are provided by the population-based neighborhood and community parks.

M-12 The Existing Conditions section significantly minimizes the need for park and recreation facilities. We need more acres dedicated to recreational use and adequate facilities on existing sites as well (i.e. swimming pool). Torrey Hills and Carmel Valley simply do not have the recreational facilities necessary for the existing population.

M-13 As stated on page 3 of the scoping letter, the Draft EIR should identify potential areas for urban villages and/or underutilized transit corridors for density increase in community planning areas with known deficiency of parks and open space. The Draft EIR should clearly disclose the unfunded needs for park and recreation facilities for each community planning area and the City as a whole. The Draft EIR should also identify any project features which would result in open space/parkland acquisition or improvements in existing recreational facilities. Funding sources for existing as well as future needs should be clearly identified. If not, the impact must be considered significant and unmitigated.

Thank you for the opportunity to comment. We look forward to reviewing the revised Draft EIR.

Sincerely,


Jim Casale
Chair



Kathryn Burton
Vice-Chair

STAFF RESPONSE M-11: Comments noted. The distributed DEIR discloses the opportunity to incorporate allowed passive uses in MHPA urban canyons in the older, developed areas of the core area of the City where aging pipelines need to be accessed for maintenance, repaired, and/or replaced.

STAFF RESPONSE M-12: The distributed DEIR disclosed a list of needed new parkland, mainly, in the urban core areas, where parklands need to be acquired pursuant to the existing community plans. Park acquisition and development may result in physical changes to the environment which may pose a potential significant impact. In CEQA analysis adding facilities such as swimming pool or tot lot to an existing park, would usually not pose adverse effect.

STAFF RESPONSE M-13: A clarification of the proposed project, the strategy to guide future growth and development, that the strategy would not result in any land use change or site any specific village location changed the scope of the EIR analysis to solely address the growth policy and the consideration by the decisionmaker to consider a vision for City growth and a direction to proceed with the strategy implementation. This change occurred with critical review of the proposal subsequent to the NOP distribution. The commenter's cited detailed analysis is not required for a programmatic, policy-level EIR. Also refer to previous Staff Response A-7.



TORREY PINES ASSOCIATION

Torrey Pines State Reserve
P.O. Box 345
La Jolla, CA 92038

CITY OF SAN DIEGO
APR 02 2002
PLANNING DEPARTMENT

March 25, 2002

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

Ms. Lowry,

N-1 Thank you for providing the Torrey Pines Association (TPA) the opportunity to review the Draft Environmental Impact Report (LDR DEIR No. 40-1027) known as the City of Villages Growth Strategy/Strategic Framework Element (COV/SFE). Because of the TPA's responsibility to protect the Torrey Pine and its related sensitive habitats, especially the Pecos Lagoon and Marsh, we are concerned about proposed new development that may take place in the Pecos Watershed and impact the lagoon and salt marsh:

N-2 We understand that this DEIR is a Program EIR that will be followed by many tiered levels of environmental review that will become the City's new growth policy and that "if this new growth policy is adopted, it would guide future growth within the City." However, in order for this document to serve that important function, there should be an analysis of the anticipated changes in growth that includes identification of impacts and proposals for mitigation of the consequences of these impacts. Future projects' impacts would be covered by this analysis and thus found to be consistent with the City's growth strategy and covered by an adequate environmental document.

N-3 Unfortunately, this process could not take place because the presentation of potential impacts and their mitigations are not presented in this Program DEIR. This DEIR is not an adequate environmental document because it is written "plan-to-plan" not "plan-to-ground" as required by the California Environmental Quality Act (CEQA). The increase in population anticipated in San Diego in the next twenty years may be consistent with a land use plan category or designation and thus have impacts covered plan-to-plan, there will surely be significant plan-to-ground impacts that must be addressed in this DEIR document in order for it to "cover" all anticipated future impacts.

STAFF RESPONSE N-1: Comments duly noted.

STAFF RESPONSE N-2: The commenter is incorrect to assert that "future projects' impacts would be covered by this analysis". This EIR covers the adoption of the proposed City of Villages strategy without any land use change or siting of any potential villages; this EIR allows the decisionmaker to adopt this vision for future growth within the City of San Diego and to direct the implementation of this proposed strategy. The subsequent implementation by community plan amendments or updates would be required to be analyzed in separate, second-tiered CEQA environmental document.

STAFF RESPONSE N-3: The commenter is incorrect in asserting that the distributed DEIR was "written "plan-to-plan" not "plan-to-ground" as required by the California Environmental Quality Act".

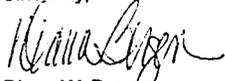
This EIR covers the adoption of the proposed City of Villages strategy without any land use change or siting of any potential villages; this EIR is solely policy-level, programmatic document. On a strictly policy level, the existing condition is the existing Guidelines for Future Development in the current Progress Guide and General Plan as well as the existing as-built (ground) condition. It is difficult for a policy-level document such as this City of Villages (COV) EIR which addressed a growth strategy that results in no direct land use change and no specific location siting, to determine the appropriate as-built existing condition to compare the proposed strategy's indirect effects. Unlike analysis for a development, it can not be assumed that all potential villages/corridors could or would be built upon the approval of this proposed strategy; its implementation is phased with subsequent discretionary actions and tiered environmental review. The environmental analysis in the distributed DEIR assumed that the proposed 17,000 to 37,000 attached homes along with the allowable units of the existing plans would be built out by the year 2020 because the population forecast showed that there would not be sufficient housing to accommodate the projected population increase. The analysis of the DEIR is conservative in its approach, and this method verges upon a worst-case scenario. If strict analysis of the proposed strategy to existing current conditions were conducted all issues would be less impactful; impacts to landfill capacity could be considered significant but mitigable. Only impacts to air quality and regional traffic would remain significant and unmitigated due to the project's contribution to an existing significant condition of ambient air quality in excess of state health standards and of congested freeways.

N-4 One area of concern to the TPA is water quality in the Penasquitos Watershed that will be directly impacted by the future Village development proposed for Mira Mesa and Penasquitos. The impacts associated with this anticipated growth should be identified, impacts assessed and mitigations proposed. The section as written today provides a review of valuable city planning documents but does not provide the necessary analysis of the impacts generated by the creation of a City of Villages.

N-5 The TPA realizes that preparation of an adequate DEIR for the project that is envisioned by the City of Villages concept would be an enormous undertaking. Perhaps it could be made more manageable if it were prepared in segments, such as by watershed. The Cumulative Effects Section could then be organized by bringing together each watershed's analysis to which has been added the potential impacts to those watersheds proposed in adjacent jurisdictions. The obvious exception to this would be traffic impacts but traffic analysis has models that can carry out analyses of regional effects and provide alternative mitigations to correct the problems.

N-6 Again, thank you for the opportunity to review the City of Villages DEIR. If smart growth principles are applied, the City's natural resources will be better protected and the TPA wholeheartedly supports that approach to growth.

Sincerely,



Diana W. Bergen
President, Board of Counselors
Torrey Pines Association

Cc: Councilman Scott Peters. District 1

STAFF RESPONSE N-4: The distributed DEIR adequately addressed water quality (stormwater control) impacts of the proposed City of Villages by generally assessing that the redevelopment and infill of existing commercial areas may have the double potential benefit of eliminating uncontrolled, large parking lot with structured parking where runoff would be routed to the City's sewer treatment system. In addition, the ultimate, resultant attached units require less landscape irrigation such that water runoff would be less and the runoff would potentially carry less lawn fertilizers or pesticides. It should be noted that most new development would be required to control stormwater runoff. The cited communities would need to have subsequent plan amendments or updates to implement villages; these action would require additional environmental review which would include any adverse effects on the Penasquitos Watershed. As disclosed in the distributed DEIR, the City is preparing a Watershed Management Plan for Penasquitos; results/recommendations of this effort can be addressed in subsequent documents and incorporated in future development.

STAFF RESPONSE N-5: The distributed DEIR adequately addressed the indirect impacts of the proposed City of Villages strategy which could ultimately result in 17,000 to 37,000 additional attached units. The commenter's suggested analysis approach by watershed areas, a geographic area which may work for the Penasquitos Watershed since much of this area is mostly within the City of San Diego with portions in the County and Poway. But other watersheds such as San Diego River and Otay River terminates within the City but it drains a large areas outside the City's land use jurisdiction; most of large drainage area of the Tijuana River is in Mexico. The commenter is correct in asserting that this approach may not work for traffic; this suggested approach broadens the scope of analysis to include other jurisdictions (or nation) who as a minimum, would resent any City attempt to direct their growth. This would be a subregional growth management effort. And while the City contains 40% of the population and 60% of the jobs, which allows the City to exert influence in the region, the City can only lead with progressive/innovative planning within our jurisdiction and hope that others will follow the City's example. The County and City of Chula Vista, two of the City's larger adjoining jurisdictions, have also begun their respective General Plan updates. While these are separate efforts, the City will continue to coordinate with the County and Chula Vista, as well as with SANDAG, the regional planning agency.

STAFF RESPONSE N-6: Comments duly noted.

CITY OF SAN DIEGO
MAR 26 2002
PLANNING DEPARTMENT

March 21, 2002

Mr. Lawrence C. Monserrate, Assistant Deputy Director
Development Services Department
CITY OF SAN DIEGO
1222 First Avenue, M.S. 501
San Diego, CA 92101

Subject: The City of Villages Growth Strategy and Strategic Framework Element DEIR (LDR
No. 40-1027/SCH No. 2001061069)

Dear Mr. Monserrate:

- O-1 The Executive Committee of the University Community Planning Group ("UCPG") has reviewed the above referenced draft EIR and submits the following comments:
- O-2 The EIR outlines seven significant negative impacts that the City of Villages Growth Strategy would have on the City of San Diego. The attached Exhibit A outlines the UCPG's specific concerns regarding the EIR and these negative impacts. One of the main concerns to the UCPG is the impact 17,000 to 37,000 new homes would have on transportation. 180,000 to 240,000 additional travel trips are anticipated to be added to already congested roads and freeways. Even with the addition of the proposed new transit system and enhancements to encourage walking, the reduction in travel trips would ONLY be six percent.
- O-3 The City of Villages Growth Strategy promotes mixed-use developments. However, the draft EIR does not analyze the impact additional commercial uses would have on transportation, air quality, solid waste disposal, etc. Therefore the draft EIR should be reevaluated to include analysis of the effect of commercial elements of the City of Villages Growth Strategy.
- O-4 Focusing on the University City area, the adopted UC Community Plan has already been identified by the City of San Diego as an example of the City of Villages concept. University City currently has the highest density of any San Diego area outside of downtown and therefore opposes any effort to increase development in excess of the adopted Community Plan until effective mass transit systems are in place.
- O-5 It is also important to note that the State of California intends to expand the UCSD Campus from 20,000 to 30,000 students, and 28,925 to 52,350 in total population, with little ability for the City or community to influence the process. The adopted community plan encourages construction of adequate and affordable student housing in the north UC area. The UCPG encourages UCSD to provide up to 50% of these housing needs on campus as called for in the existing community plan, to ease congestion to surrounding areas.
- O-6 With a current population of 50,000 living in 24,000 units (2/3 being multifamily), 5,000,000sqft Office, 8,000,000sqft Science/Research, over 2,000,000sqft Shopping/Retail, 2,100 Hotel Rooms, and the UC Campus, the University City Community is built out to 95% of its plan. Proposals for remaining areas include several thousand multifamily homes, 2,500,000sqft Office/Science/Research space, and 1,000 Hotel rooms.
- O-7 Today, traffic circulation within and through the community is at failure levels, with every freeway interchange at service level "F" during rush hours. Once the University City Facilities Benefit Assessment projects are completed, it is anticipated that congestion will remain an issue due to excess traffic on the freeways.

STAFF RESPONSE 0-1: Comment noted.

STAFF RESPONSE 0-2: The distributed DEIR determined that the proposed strategy to guide future growth and development, would result in nine, not the commenter's cited seven, significant impacts; of these nine, three significant impacts (traffic, air quality, and landfill capacity) were determined to be unmitigated at this time.

The cited six percent has been revised to ten percent of the total trips attributable to transit, walking, and bicycling.

STAFF RESPONSE 0-3: SANDAG, in the 2020 Forecast determined that there was enough employment (including retail) land to accommodate the projected population in the year 2020. As stated previously, this population projection has been reduced for the year 2020 by SANDAG's preliminary projection to the year 2030; so, it can be assumed that there would be even more employment land available for 2020 to match the expected population growth.

It should be noted that another traffic model run was conducted with redistributed employment into the potential villages and with refined transit improvements such as transit stations closer to potential village sites. The results showed that the percentage of transit, walking, and bicycling trips approached ten percent of the total trips; this slight increase was attributed to transit refinement rather than the redistributed employment. These results are included in the Final EIR. The determination remains the same; traffic impacts are still significant and unmitigated.

STAFF RESPONSE 0-4: Comments noted. It should be noted that in terms of residential density, the commenter's assertion that "University City currently has the highest density of any San Diego area outside of downtown" is incorrect. There are eleven community plan areas excluding downtown, which currently have residential densities higher than University City; seven of these areas have densities which are 50% higher. In terms of employment, while University City has its share of developed non-residential uses, Kearny Mesa, Mira Mesa, and Otay Mesa have more developed employment land. In addition, fifteen communities within the City excluding Downtown, have higher employment densities.

STAFF RESPONSE 0-5: Comments duly noted. The City's ability to exert influence on UCSD's expansion proposal are limited to the review of any CEQA document they may be required to distribute for review and the coordination with City departments for sewer, water, reclaimed water, or road improvements.

STAFF RESPONSE 0-6: Comments duly noted

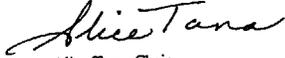
STAFF RESPONSE 0-7: Comment noted. It should be noted that the distributed DEIR included a map of freeway congestion in year 2020. This map, taken from SANDAG's 2020 Regional Transportation Plan, showed that the planned freeway improvements (which include the High Occupancy Vehicle (HOV) facilities) would reduce freeway congestion to immediate section of I-5 prior to its merge with I-805. Community level traffic circulation would be analyzed with the current privately initiated plan amendment for University Towne Center (UTC) and with any subsequent plan amendment or update to implement the proposed City of Villages strategy.

O-8

Because University City is close to its maximum allowable density and is anticipated to exceed this amount once UCSD expansion projects are completed, UCPG recommends the City of San Diego first identify communities that are under built and/or in need of redevelopment. Once these projects are completed then the City should reevaluate the need for additional village locations. Please refer to Exhibit B attached hereto which details the UCPG "Position Statement" submitted to Mayor Dick Murphy and City Council.

We appreciate your consideration of our concerns with this project as it is proposed in the draft EIR. Please feel free to contact me if you or your staff have any questions regarding the foregoing.

Sincerely,



Alice Tana, Chair
University City Planning Group

STAFF RESPONSE O-8: If the City of Villages strategy is adopted by City Council, the more detailed planning necessary to implement the strategy in individual communities will commence. It is anticipated that three to four pilot village locations will be selected by City Council in 2003. These will likely be in areas where there is the greatest potential for new development or redevelopment and community support for village development. Only a few community plan updates will be done each year with the highest priority being given to those areas with greatest potential for village development and community support for this concept. It should be noted that while the City will not begin this process by focusing on communities that oppose application of the City of Villages strategy in their community, property owners have the legal right to request plan amendments for development intensity increases on their property at any time. The owners of University Towne Center have already initiated a proposal to increase development intensity on that property.

UCPG - EXHIBIT "A"

Specific Comments to The City of Villages Growth Strategy and Strategic Framework Element Draft EIR
(LDR No. 40-1027/SCH No. 2001061069)

DISCREPANCIES BETWEEN THE SCOPING LETTER AND THE DRAFT EIR

Many of the issues identified in the NOP/Scoping letter were either not discussed or inadequately evaluated in the Draft EIR. The Draft EIR should be considered incomplete. All NOP/Scoping items should be considered significant and I therefore recommend that each item be identified, evaluated, commented on and the EIR be reissued for Public Comment.

1. Scope of the EIR

- a. It is clear that implementation of the Growth Strategy would impact the City by increasing the amount of residential, commercial and employment components of the City's General Plan.

On page i (first page of the EIR) it is stated that the City of Villages Growth Strategy-Strategic Framework Element "provides a long-term strategy for accommodating the City's forecasted population growth and development needs, predominately through effective and innovative redevelopment and infill in mixed-use villages of higher density attached homes, public space and commercial and/or employment centers." On page VII-1 it is stated "The proposed project would result in infill and redevelopment of areas with existing commercial-employment uses or multi-family homes; the proposal would intensify these existing uses...". And finally the goal of the strategy is to provide "...infill and redevelopment with mixed use residential component is added to existing or new commercial development" (p. I-8).

- O-9 It is stated (p. I-12): "The EIR addresses a General Plan policy, a proposed growth strategy." a "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 an additional 17,000 to 37,000 dwelling units..."

In other words, this EIR is only addressing the impacts of the residential component of the Strategy. The scope of this EIR should not be limited to the environmental analysis of the additional dwelling units but should also include the impact on San Diego's traffic, air quality, solid waste disposal, energy and water needs, etc. due to the intensification of commercial and employment centers as well. In other words, the scope of this EIR should be that of analyzing all impacts created by implementation of the Growth Strategy. Additionally the Draft EIR should address the impacts on existing neighborhoods whether they are single family or multi-family. The Draft EIR only addresses these areas as redevelopment in the broad context of increasing density rather than revitalizing existing family housing components.

2. Project Description

- a. On page III-3 it is stated that "University Towne Center and the higher density development surrounding it are an example of an existing Urban Village Center" (underlining added for emphasis). However the Map of the City of Villages (4th Draft) does not correctly identify this area as such. It is marked as an Urban Village Center targeted for development. It should be marked as an Existing Village (an area not slated for redevelopment under this Strategy but its developmental status would be re-evaluated after year 020). The same reasoning can be used for the area marked in the La Jolla Village Square area. The map shows it as an area targeted for development into a Neighborhood Village where as it is already an existing Village with higher density, mixed-use components.

O-10

Neither of these two areas fit the criteria for targeting them for future development: they are not areas in need of redevelopment (they are relatively new developments) nor do they fit the criteria of infill (these areas are fully developed).

STAFF RESPONSE 0-9: The proposed Strategic Framework Element and City of Villages strategy does not recommend an overall increase in commercial and employment development beyond that currently projected in the General Plan and Progress Guide. The City of Villages strategy recommends possible subsequent intensification of existing employment and commercial areas and redistribution of employment and commercial development to be more focused in pedestrian and transit oriented locations. The specific locations where employment and commercial development would be changed would be determined during the subsequent community plan amendment or plan update process and is not required to be analyzed in this programmatic, policy-level EIR.

STAFF RESPONSE 0-10: The University Towne Center (UTC) and La Jolla Village Square areas have been identified as potential future Village Centers on the City of Villages (COV) map because they have characteristics indicating potential for pedestrian and transit oriented redevelopment including location near proposed future transit lines and stations and large areas of surface parking that could possibly be utilized more efficiently. However, a much more detailed examination of these sites including traffic and infrastructure analysis and site specific environmental review would be necessary before the plan designations of these sites could be changed. The owners of the UTC have proposed a privately-initiated community plan amendment to increase intensities on this site in conjunction with transportation improvements. This project is a separate private proposal and not covered by this COV EIR. The forthcoming, separate environmental document and traffic study for this UTC proposal will be key to determining whether this site can actually accommodate additional development intensity.

3. Comprehensive Strategy

a. On page III-6 it is stated that "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." References to sources of funding, such as the TOT Tax, are inconsistent with the reality for already over committed resources.

O-11 i. The list of new funding sources on the handout given at the public outreach meeting held in the UTC area contains mainly sources obtained through increasing existing taxes, creating new taxes or creating/raising fees for City services. Given the results of our last election for Proposition E (where 54% of the voters voted for a requirement of a supermajority before taxes could be raised), the majority of the public want tighter control over taxes. Therefore, given this public climate, revenues from new or increased taxes cannot be thought of as a guaranteed source of income to fund necessary public infrastructure/facilities needs.

O-12 ii. Reallocation of existing resources is also hard to accept as a source of income. Today there are serious deficiencies in public infrastructure/facilities and they are not being corrected by reallocation of existing resources (i.e., deficiencies in schools had to be corrected with passage of a bond measure, the same goes for libraries. Deficiencies in the sewage collection system are being met by increasing sewer rates; the same goes for water, gas and electricity where rates have been increased).

O-13 iii. "Adjustment to certain facilities standards" may result in a lower quality of life and certainly will lower the standards of "certain facilities" which is not a stated goal in this new Growth Strategy.

4. Land Use

a. The scoping letter (dated 6-4-01 from Lawrence Monserrate to Coleen Clementson: point II, 1.3, p. 2) requests a "comparison of existing built environment, potential development per existing plan and zone, and envisioned optimum density/intensity."

O-14 Although a City of Villages map has been submitted, an actual table listing the acreage of the various villages is lacking. As a result, the comparison called for in the scoping letter is missing in this EIR.

O-15 Supposedly once the Growth Strategy is put in place, the various Community Plans will be updated accordingly to implement the Growth Strategy. Without an accurate accounting of the acreage of the various Villages it will be difficult to uniformly enforce the density increases in the various communities as stated in the Strategy.

O-16 b. The EIR summarizes policies present in the General and various Community Plans which are in effect today and states: "Generally, the proposed City of Villages strategy...would contain the intent of the current plans" (p. IV-20).

Unfortunately many times by adopting "general guidelines" and eliminating specific ones, the "intent" of the guidelines becomes muddled and subjective and thereby lost.

O-17 c. The conclusion of the second paragraph under the subheading "Inconsistency/conflict with environmental goals of an adopted land use plan" (p. IV-20) is not objective. It is stated: "The proposed City of Villages strategy with its proposed alternative mode accessibility would likely result in less parking as a potential site is redeveloped as a village; there would be as a minimum, a net decrease in parking spaces."

STAFF RESPONSE 0-11: Comments noted.

STAFF RESPONSE 0-12: The future success of the proposed City of Villages strategy will be dependent on provision of adequate public transportation and other infrastructure to support the proposed pattern and intensity of development. If adequate funding to ensure this infrastructure can not be found, only limited implementation/development would be realized under this strategy.

STAFF RESPONSE 0-13: No reductions in facility standards resulting in lower quality of life are proposed or would be considered acceptable in the City of Villages strategy. However, certain citywide facility standards may need to be adjusted in recognition of the fact that facility needs differ in different types of communities throughout the City.

STAFF RESPONSE 0-14: The commenter's cited lack of specificity is due to the clarification of the proposed project that when approved, the proposed strategy would not result in any land changes or site any potential village; therefore, the distributed DEIR adequately addressed impacts on a city or region wide basis. This EIR allows the consideration of a growth policy direction only; implementation requires phased approvals with separate/additional environmental review.

STAFF RESPONSE 0-15: The distributed DEIR addressed impacts anticipated from the proposed citywide increase of 17,000 to 37,000 dwelling units above the remaining residential capacity in existing community plans. Specific locations and acreages of potential villages and redevelopment sites would be determined by subsequent community plan amendments or updates and are not required to be analyzed in this document. Implementation of specific villages will be determined during the community plan update or amendment process anticipated to begin subsequent to adoption of the proposed Strategic Framework Element and City of Villages strategy if approved by the City Council.

STAFF RESPONSE 0-16: Adoption of the proposed Strategic Framework Element will replace the current Guidelines for Future Development; however, it will not eliminate other guidelines in the General Plan or any community plans. Any revisions to these specific guidelines would come only during the subsequent process of updating or amending the General Plan and community plans. This process will include more specific and subsequent environmental and extensive public review.

STAFF RESPONSE 0-17: Comment duly noted. The EIR will be clarified to indicate that there will not be a reduction in overall number of parking spaces but there may be a reduction in the ratio of parking spaces to residents or employees in village locations where transit and pedestrian usage increase.

O-18 North University City has been developed along the guidelines of a "village" and parking accommodations for all projects have followed "city wide parking standards" and yet today many areas lack sufficient parking: our streets are constantly lined with parked vehicles as onsite business and residential parking spaces are filled to capacity. The parking needs of the proposed high increase in density in the UTC area will probably NOT be offset by improvements to mass transit. Increases in density within the employment center will continue to require high ratios of parking because of the need or desire of employees to live in lower cost housing outside of the mass transportation corridors. Not everyone will want to live in a village.

O-19 d. Conclusion: Significance of Impacts (p. IV-21)
 In essence the EIR states: "...according to the City's significance guidelines, inconsistency/conflict with the environmental goals, objectives, or guidelines of a community plan or the General Plan are considered a significant land use impact" but since the above mentioned documents would be "changed to reflect the new growth policy.... the proposed growth policy would not pose a significant land use impact" and "no mitigation is required".

Said more simply: According to this EIR, there are significant land use conflicts between the existing land use documents and the new Growth Strategy; but since the existing documents will be all changed, there is no conflict. Therefore there is no significant land use impact by the new Growth Strategy and no mitigation will be required.

This does not seem like a valid argument.

4.1 Living Wage

O-20 References to "Adopting Living Wage Legislation" are too broad in scope for this EIR and it's supplemental documents. Such legislation is best left to the State and Federal policy makers. Any attempt at implementing such an effort would have an important incremental cost that would further burden the successful outcome of The City of Villages.

5. Transportation/Circulation

O-21 a. The scoping letter (p. 6) requests that the EIR "address the regional transportation system (freeways and prime arterials) and its ability to adequately handle the additional traffic from the population increase..."

Under existing conditions, the EIR states that there are twenty-five street segments in San Diego which currently operate at LOS E or F (p. IV-23). These street segments are contained in nine communities. LOS E is defined as "Extremely unstable conditions where maneuverability and psychological comfort becomes extremely poor. Speeds and flow rates fluctuate.... Significant delays become possible...." LOS F is defined as "Stop and go conditions, considerable delays with forced flow where speeds are reduced for short time periods to zero with high densities."

Missing from this list are streets in the UC area: Miramar Road, Genesee Avenue (from Torrey Pines Road to I-52) and La Jolla Village Drive. These street segments fall within the definitions of LOS E and F.

O-22 b. Table B-3 (p. IV-29) does not correspond completely with map on the preceding page: missing from the table are the freeway segments a) I-5/I-805 junction and b) I-15 north of SR-52. These two segments are shown on the map to be segments predicted to have LOS F in 2020.

c. The scoping letter requests identification "of affected roadways with less than acceptable level of service (LOS D) near or servicing the targeted areas" (p. 6, comments to point #4). The EIR only discusses areas with LOS F. Areas have not been identified with LOS D or lower servicing the targeted areas.

STAFF RESPONSE 0-18: Under the proposed City of Villages strategy, redevelopment and land use intensification in the University Towne Center area could only occur after adequate transit, transportation improvements, and other infrastructure are assured.

STAFF RESPONSE 0-19: Any proposed change to an existing planning document creates a "conflict" between the old and new document. As planning documents age, they sometimes become less relevant and responsive to current community and/or citywide needs. The existing General Plan is over 20 years old and many community plans are almost as old. They were prepared at a time when the City had much more vacant land, lower land costs and a smaller, less diverse population. The proposed Strategic Framework Element and the 5-Year Action Plan are intended to provide general guidance in updating those existing planning documents that need revision to be responsive to current conditions and needs.

STAFF RESPONSE 0-20: Comment noted. The distributed DEIR included the cited provision because it is related to one of the projects goal to attempt to promote middle-income jobs and provide affordable housing. This issue will be further researched and discussed prior to recommendation for adoption.

STAFF RESPONSE 0-21: There is no potential village or corridor identified on Miramar Road; the other two cited segments will be added to the list in the Final EIR.

STAFF RESPONSE 0-22: The cited two freeway segments were listed in the distributed DEIR (p. IV-23) and they were included on the congested freeway map for the year 2020. The cited table in the distributed DEIR shows freeway segments in the urbanized core area of the City where if approved and implemented, the proposed City of Villages would ultimately result in most of the potential villages and would pose the most traffic impacts.

The distributed DEIR disclosed that 25 street segments within the City operate at an unacceptable level-of-service (worse than LOS D); it listed eleven road segments which may be further impacted if the proposed City of Villages strategy is fully implemented through subsequent discretionary actions; commenter's cited Genesee Ave and La Jolla Village Drive will be added to the listed currently impacted roads in the Final EIR.

- d. The EIR states that even if 100% of all listed freeway improvements take place, SANDAG predicts there will still be sections of the freeways which would be operating at LOS F. Most of these segments are located in areas serving Downtown, Mission Valley and UC: areas which are slated to absorb the highest densities through implementation of the Growth Strategy. Perhaps one of the goals of the Growth Strategy should have been to locate Village sites in areas that are not predicted to be at failure traffic conditions.
- O-23
- e. The EIR for this section concludes (p. IV-32) by stating that :
- i. There would be only 6% reduction in all travel trips attributable to transit use and walking and traffic congestion is, and would continue to be a regional problem; therefore, the project's traffic impact is significant.
- O-24
- ii. Space for space replacement for parking with new village development may not occur and, therefore, could pose a potential significant impact. This last statement should be carried forward to the Conclusion section of the EIR at the front of the report. Also this conclusion is inconsistent with the statement made on p. IV-20 (see point 5c of these comments).
- O-25
- f. Using the data presented in Table VI (pp. VI-4 through VI-33): of the nine projects listed in the University City area, approximately 50% have unmitigated traffic related impacts. This compares unfavorably to a City wide percentage of approximately 20% (a total of 25 projects out of 128 listed have unmitigated traffic related impacts).
- O-26
6. Air Quality
- a. As discussed in the Transportation/Circulation section, portions of the City have gridlock traffic conditions. During gridlock on major arterials and freeways (especially during peak hour activities), the air emissions go way up. This document did not address this particular issue.
- O-27
- b. With respect to the California Clean Air Act of 1998, the San Diego Air Basin is currently classified as a serious non-attainment area. Among other steps, San Diego is required to adopt transportation control measures. The State computer model (URBEMIS 7G) indicated that development design features, design, and siting which encouraged walking and biking in and around potential villages and vastly expanded public transit to these villages and along corridors result in only 9-10% potential reduction in motor vehicle emissions. The conclusion of this section: "Although partially mitigated, the project's air quality impact remains significant and unmitigated" is not present in the Conclusion section (located at the beginning of the report) of the EIR.
- O-28
- c. Using the data presented in Table VI (pp. VI-4 through VI-33): of the nine projects listed in the University City area, approximately 25% have unmitigated air quality impacts. This compares unfavorably to a City wide percentage of approximately 8% (a total of 15 projects out of 128 listed have unmitigated air quality impacts).
- O-29
7. Paleontological Resources
- a. Although this document discusses various formations in the San Diego area, there is no clear table listing the information requested on page 11 of the scoping letter (i.e., "identify targeted areas for proposed increased density/intensity which are underlain by fossiliferous formation..."). The EIR concludes "paleontological resources...can be mitigated with strict adherence to standard mitigation measures" (p. IV-51).
- O-30

STAFF RESPONSE 0-23: The commenter's suggested planning for growth by areas which experience less freeway congestion is somewhat contrary to the intent of the proposed strategy. While the commenter's cited Downtown and Mission Valley are indeed the targeted areas for the bulk of the potential subsequent intensification, there are several communities which could ultimately have more potential village sites and transit corridors with higher yields of mixed-use redevelopment and infill with attached units than University City; these communities include Mira Mesa, San Ysidro, Southeastern San Diego, Clairemont Mesa, Midway-Pacific Highway, and Otay-Mesa Nestor.

STAFF RESPONSE 0-24: As stated previously, the cited six percent has been revised to nine percent of the total trips attributable to transit, walking, and bicycling. It is more accurate to state that traffic impacts were determined not just significant, but also unmitigated at this time.

STAFF RESPONSE 0-25: Refer to previous Staff Response 0-17.

STAFF RESPONSE 0-26: Commenter's interpretation of the cumulative impact table of completed EIR's is correct; the University City Community Plan Area has been recognized as a area of significant local traffic congestion. The only remaining viable, untried solutions are extensive public transit improvements to allow transportation modal choice and increased facilities to improve walkability and bicycling to lure motorist out of personal vehicles. These solutions are an integral part of the proposed strategy.

STAFF RESPONSE 0-27: The localized air quality effects of carbon monoxide concentration due to traffic congestion was disclosed in the distributed DEIR; specific impact analysis requires site-specific project detail. Since this proposed City of Villages strategy does not result in any land use changes or site specific village locations, the suggested analysis is speculative and beyond the scope of this programmatic, policy-level EIR.

STAFF RESPONSE 0-28: The commenter is correct. The air quality discussion and determination that these impacts are significant were missing from the Staff Conclusion section of the distributed DEIR. This discussion and determination have been added to the Final EIR. It should be noted that this revised Staff Conclusion was included in the EIR version available on the City's website.

STAFF RESPONSE 0-29: Commenter's interpretation of the cumulative impact table of completed EIR's is correct; since the University City Community Plan Area has been recognized as an area of significant local traffic congestion, the related air quality impact of larger projects in the area have also been determined to pose significant and unmitigated impacts.

STAFF RESPONSE 0-30: It was clarified that the proposed City of Villages strategy would not result in any land use changes or site specific village locations. Therefore, the suggested analysis in the cited Notice of Preparation was no longer applicable and became beyond the scope of this programmatic, solely policy-level EIR. The distributed DEIR adequately addressed paleontological resources on a programmatic level and disclosed the appropriate mitigation measures which would mitigate any subsequent significant effect. Refer to previous Staff Response B-2.

8. Noise

a. The Transportation Element of the Progress Guide and General Plan states that residential uses are compatible with annual community noise equivalent level of up to 65 decibels. The EIR states "There are clearly areas which exceed the 65 dBA CNEL that are identified by the proposed City of Villages for possible residential intensification" and "All new residential development with exterior noise levels above 65 dBA CNEL is determined to be exposed to significant noise impacts". The EIR states that interior noise levels can be attenuated to an interior level of 45 dBA and concludes that "The noise attenuating site design features for residential uses can be more easily accomplished with mixed use development".

O-31

Most of the noise attenuation measures are designed to lower high levels of exterior noise to acceptable levels within dwelling units. The City of Villages proposal emphasizes outdoor uses (i.e., pedestrian friendly streets, open plaza, public meeting areas, etc). The use of set backs, site design, etc. may not be sufficient to mitigate the noise impact in these outside uses. Therefore the conclusion that the noise impact is mitigatable may not be substantiated.

Also it appears that by adopting the City of Villages Growth Strategy, we will be lowering the City's standard for noise: the cut off is presently at 65 dBA for residential development. The new Growth Strategy does not give a cut off but appears to think that areas with levels above 65 dBA are acceptable for residential development.

9. Storm Water/Water Quality

a. The statement on page IV-59 is unclear "Urban runoff pollution is not only a problem during rainy seasons, but also year-round due to unconstrained use of imported water."

O-32

b. Although there are several pages of description of various plans to improve the quality of urban runoff and storm water, the only specific points discussed in this EIR are 1) the conversion of large parking lot surfaces into mixed-use developments with subterranean parking (where automobile drippings would be captured and treated before entering the sewage system) and 2) the villages would have drought tolerant, low water use plant species and therefore landscape runoff would be lowered.

O-33

c. The effect of 180,000 to 240,000 additional trips (discussed in the transportation section) on the quality of storm water runoff is not presented. It would seem that the additional traffic would have an effect on the quality of the storm water runoff especially with respect to the first rains of a season.

O-34

10. Water Resources/Conservation

a. Throughout the EIR there is a switching of the words "detached home" with "attached homes" which may cause confusion to the reader. This switching of words is most distracting in this section (where it occurs 4 time in the third paragraph on page IV-73).

O-35

11. Recreation Facilities

a. There is no breakdown of the existing deficiencies in park and recreational facilities, only a general statement that deficiencies exist (p. IV-97).

O-36

STAFF RESPONSE 0-31: The main source of noise in the urbanized core, especially in areas of the potential villages and transit corridors, is from traffic. The commenter's cited potential noise producing components of a village-type development most likely would not be louder than the ambient traffic noise from major streets. These detail would be analysed in required, subsequent project-specific environmental review.

The commenter's impression that the proposed strategy would change the noise standards is incorrect. The City of Villages strategy would not change the acceptable standard for noise in residential areas (65 dBA in exterior areas and 45 dBA in interior areas.)

STAFF RESPONSE 0-32: This cited statement is intended to include pollutant runoff from landscape irrigation and personal car washing.

STAFF RESPONSE 0-33: The commenter is correct; these are mitigation measures. In addition, the distributed DEIR (p. IV-63) also listed the type of new development which must meet the recently adopted stormwater/runoff control requirements.

STAFF RESPONSE 0-34: The distributed DEIR disclosed that all urban canyons have stormwater outfalls; these collect the runoff from most of the streets. The DEIR also suggested that since the City must control all runoff, there was an opportunity to include passive water quality control in some urban canyons which also contain aging pipelines which need to be replaced or repaired. Few of these canyons were included in the City's planned wildlife preserve, the Multi-Habitat Planning Area) which need to be managed. These canyons, which also contain non-native, exotic vegetation which can be removed and revegetated with native riparian plant species which can provide passive water quality control; this enhancement can be done when the pipelines need to be replaced, repaired, or accessed.

STAFF RESPONSE 0-35: Comment duly noted. The proposed City of Villages strategy would ultimately result in the addition of only attached homes. This has been corrected in the final EIR.

STAFF RESPONSE 0-36: It is beyond the scope of this programmatic EIR to discuss the many specific park and recreation deficiencies throughout the City. These deficiencies will be relevant factors in shaping the individual community plan amendments and updates intended to follow adoption of the Strategic Framework Element and will be discussed in the environmental documents that accompany them. The distributed DEIR listed new parkland needs in the urbanized core areas identified in existing community plans. These particular recreation needs were listed because park acquisition or development would cause a physical change and therefore, may pose a adverse effect to the environment.

O-37 b. The conclusion of this section is that the impact of this growth strategy is potentially significant but the impacts can be mitigated to below a level of significance either by a) increasing facilities at existing parks and recreational centers and/or b) "find alternative sites for enhancement/improvements such as the urban canyons..."

i. The implementation of (a) assumes that existing facilities can accommodate increased usage. No data is presented; therefore, this assumption is unsupported.

O-38 ii. The implementation of (b) may not be compatible with the purpose of the MHPA. By opening urban canyons to a higher level of recreational uses, the environmental value of the canyon would be diminished. The plant and animal life within the canyon would be adversely affected by the closer contact with people, and many times their pets. Erosion, littering, dumping, and unwanted homeless camps are only some of the adverse effects of opening urban canyons to the public.

12. Mandatory Discussion Areas

O-39 a. It is stated that "...the proposed City of Villages is growth inducing because it removes obstacles for additional growth and it may potentially overburdens (sic) public facilities and services" (p. V-1).

i. This important conclusion is not carried forward to the Conclusion section of the EIR which is located at the front of the report.

O-40 ii. Discussion of school facilities and fire and police protections is dispatched in two-thirds of a page. There are no tables or text presented which exam existing and future needs of these critical public services. It is assumed these needs will be met through a long-term planning strategy. In the past, San Diego has had long term planning strategies in place however we presently have deficiencies in these public services. A though examination of the existing and future needs of these services should be made.

O-41 b. Using the data presented in Table VI (pp. VI-4 through VI-33): of the nine projects listed in the University City area, approximately 25% have unmitigated Public Safety/Police Protection impacts. This compares unfavorably to a City wide percentage of 3% (a total of 4 projects out of 128 listed have unmitigated Public Safety/Police Protection impacts).

STAFF RESPONSE 0-37: Comment noted. One alternative solution besides expanded facilities at existing parks or recreational centers is the increasing of the staff which could result in more efficient use of existing facilities and possibly in extended hours. These options are critical in the urbanized core areas where new parkland may not be readily available in the affected community; these options are stated in the current Progress Guide and General Plan.

STAFF RESPONSE 0-38: The proposed City of Villages strategy does not propose any active recreation uses in environmentally sensitive areas. Some urban canyons are outside the MHPA boundaries because they lack species or habitats that the MHPA seeks to protect. Some of these canyons are highly disturbed and may contain areas with potential for some passive recreational use such as trails and/or enhancement through revegetation for visual amenity as community green space.

STAFF RESPONSE 0-39: Comment noted. It should be noted that CEQA Guidelines (Section 15126.4) states that "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment". The distributed DEIR determined that the proposed City of Villages strategy is growth inducing; unlike the other environmental issues, it simply is required to make this determination that the proposal is or is not growth inducing.

STAFF RESPONSE 0-40: Refer to previous Staff Responses B-55, B-56, B-58 and B-59

STAFF RESPONSE 0-41: Comments regarding the University Community Planning Group's reasons for opposing any further density or development intensity increases in University City are duly noted. However, it should be understood that the proposed City of Villages Strategy does not recommend any development intensity increases in University City or elsewhere in San Diego unless adequate transportation and other infrastructure can be assured to support such increases. Further subsequent analysis will be necessary to determine whether additional transportation facilities and infrastructure improvements will allow any further intensification in University City beyond the development level currently designated in the University Community Plan. This analysis will take place during review of the proposed University Town Center plan amendment and during possible future proposed amendments or updates of the University Community Plan to implement the proposed strategy.

EXHIBIT "B"

University City Planning Group:
Position Regarding City of San Diego's Draft Strategic Framework Element, "City of Villages"

The University City Planning Group (UCPG), by a unanimous vote of its Executive Committee at its regularly scheduled and noticed meeting of Tuesday, October 9th, 2001 hereby presents to the Mayor, City Council and appropriate agencies of the City of San Diego its position regarding the City's Draft Strategic Framework Element ("City of Villages Proposal" or "Proposal") on behalf of the residents and business interests of the University City community:

O-42 The UCPG wishes to express the admiration of its membership for the work and dedicated effort of our elected officials and staff in developing a plan to accommodate expected population growth in the City of San Diego. Specifically, the membership wishes to express appreciation for the efforts to include transportation, educational, police, fire, and medical services infrastructure as well as the preservation of open space as essential parts of an integrated plan.

The UCPG is honored by the City of San Diego's statement in its City of Villages literature that the University City (UC) community is a "model village" for having already achieved a well balanced mix of employment, recreation, shopping & residential uses within one of the highest density communities in the region, while attempting to administer and adhere to an adopted community plan.

The UCPG wishes to reiterate the special circumstances this community faces due to its unique character, community purpose, and designated plan:

O-43 • UC accommodates the needs of students, researchers, professors, staff, and support agencies, associated with the University of California at San Diego (UCSD). The community plan recommends residential densities, while ensuring that space is available for science and research facilities, hotels, and shopping and retail. Combined with limitations required by the Marine Corps Air Station Miramar, which prohibit residential development throughout much of UC, developed residential units per acre is the highest in the region, excepting downtown San Diego.

O-44 • The State of California intends to expand the UCSD Campus from 20,000 to 30,000 students, and 28,925 to 52,350 in total population, with little ability for the City or community to influence the process. The adopted community plan encourages construction of adequate and affordable student housing in the north UC area. The UCPG encourages UCSD to provide up to 50% of these housing needs on campus as called for in the existing community plan, to ease congestion to surrounding areas.

O-45 • With a current population of 50,000 living in 24,000 units (2/3 being multifamily), 5,000,000ft² Office, 8,000,000ft² Science/Research, over 2,000,000ft² Shopping/Retail, 2,100 Hotel Rooms, and the UC Campus, the University City Community is built out to 95% of its plan. Proposals for remaining areas include several thousand multifamily homes, 2,500,000ft² Office/Science/Research space, and 1,000 Hotel rooms.

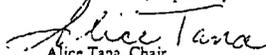
O-46 • UC's Facilities Benefit Program (FBA) anticipates and funds all practical future road and park infrastructure in the community plan, with 96% of the funds coming from private development. Despite funding, many improvements envisioned in the FBA have yet to be completed. Today, traffic circulation within and through the community is at failure levels, with every freeway interchange at service level "F" during rush hours. Once the FBA projects are completed, it is anticipated that congestion will remain at issue due to excess traffic on the freeways.

O-47 Therefore, the UCPG encourages the City to expedite the transportation, service facilities, and open space proposals of the City of Villages Proposal throughout the City of San Diego, and specifically in the UC community.

O-48 Furthermore, the UCPG believes that the UC community plan sincerely provides for the maximum allowable density for this community, and therefore opposes efforts to increase such density as expressed in the City of Villages Proposal.

O-49 Finally, the Executive Committee encourages the City of San Diego to continue dialog with existing planning groups, or appoint specific panels comprising of both City experts and Local interests, to find the means of expediting necessary infrastructure development, and to review specific zone change requests, including the consideration of establishing community-wide density limitations such as already exists in the UC Community Plan.

This statement, respectfully submitted on behalf of the residents and businesses of the University City Community,


Alice Tana, Chair
University City Planning Group

STAFF RESPONSE 0-42: Comments duly noted.

STAFF RESPONSE 0-43: Refer to previous Staff Responses Q-4 and Q-5.

STAFF RESPONSE 0-44: Comments duly noted.

STAFF RESPONSE 0-45: Refer to previous Staff Rersponse O-7.

STAFF RESPONSE 0-46: The implementation of the proposed City of Villages strategy with its desired features/amenities requires a subsequent community plan amendment or update. An important consideration to this process is the receptiveness and input of the community to this process. The University City Planning Group has expressed their opposition to the ultimate density increase for the affordable, additional mixed use attached units provision of the proposed strategy. With this opposition, as a minimum, this community plan may not be updated or amended to implement the proposed strategy in the near term. In the interim, the community's expressed desire for improvements such as the transit could possibly happen without the implementation of the proposed strategy. This and other desired improvements could become more assured if they are somehow related to the approval of the current privately-initiated plan amendment and expansion project for UTC.

STAFF RESPONSE 0-47: Comment noted. Refer to previous Staff Response O-46.

STAFF RESPONSE 0-48: Comments noted. Refer to previous Staff Response O-46.

UCPG EXHIBIT C

Issue: Transportation Systems and City of Villages Density in University City EIR

These issues came into light during recent meetings involving University Community Planning Group (UCPG) and the Golden Triangle Chamber of Commerce with MTDB regarding the "Transit First Showcase" and with an immediate follow up meeting with Councilman Scott Peters.

The issues are:

- O-49 (1) The agenda item for the Planning Commission on February 7, 2002, on Westfield UTC's request for an amendment to the University Community Plan severely impacts on currently planned traffic/residence/office density numbers. The Planning Commission approved this amendment for study.
- O-50 (2) The MTDB presentation showcasing its plan for University City, presented to UCPG and the Golden Triangle Chamber of Commerce on March 4, did not reflect current growth or solving transportation issues.
- O-51 (3) The City of Villages initiative does not reflect current and planned residential, highest employment and transportation density levels in University City.
- O-51 (4) The UCPG has discussed transit systems for 20 years with little progress. However the opportunity for a transit Center for University City and Sorrento Valley to be included with Westfield UTC's request.

O-52 Members of the University Community Planning Group, The Golden Triangle Chamber of Commerce, University of California at San Diego, a number of large corporations with offices in University City, not to mention the current residents in the area, are extremely concerned and have been tolerant of the stated issues. The University City area has the highest employment numbers in San Diego County, the residential density is at its peak, and the surface streets and freeway access routes is already a "virtual parking lot." Several corporations are considering relocating out of University City, and others may be discouraged in moving into the area.

O-53 Westfield UTC has proposed to upgrade its facilities. The UCPG sees this location as a transit center for UTC and Sorrento Valley. MTDB presented a study on University City transit systems. The study indicated that there is no problem and based its ridership of 1,200 to 1,500 at the most, while traffic does not move during rush hours. The UCPG questions the data source and analysis methods. Proposal for additional building projects include: Several thousand multifamily homes, 2.5 million square feet of office/industry/research space and 1,000 hotel rooms for University City. The University Community Plan was updated and approved by the Planning Commission in 1986 and adopted by the City Council in 1987. The Urban Design Element and miscellaneous changes were approved by the Planning Commission in 1989 and adopted by the City Council in 1990. The UCPG had planned for density levels to meet FBA requirements.

STAFF RESPONSE 0-49: Comments noted; these comments do not address the adequacy of the distributed DEIR for the proposed City of Villages strategy.

STAFF RESPONSE 0-50: Comments noted. It should be noted that in a congested area such as University City, the proposed City of Villages strategy with its proposal to improve walkability and install traffic calming and its cooperative effort with MTDB's Transit First to provide real public transit choices, may be the only viable solution choice to improve the existing condition.

STAFF RESPONSE 0-51: Comments noted; these comments do not address the adequacy of the distributed DEIR for the proposed City of Villages strategy.

STAFF RESPONSE 0-52: Comments noted. Also refer to previous Staff Responses 0-4 regarding commenter's perceived density in University City and O-7 regarding future freeway congestion.

STAFF RESPONSE 0-53: Comments noted; these comments do not address the adequacy of the distributed DEIR for the proposed City of Villages strategy.

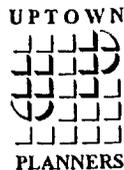
Supporters Include:

Alice Tana, Chair, University Community Planning Group
John Walsh, President, Golden Triangle Chamber of Commerce
George Lattimer, Member, Executive Board, University Community Planning Group, Developer and Building owner
Mr. Milt Phegley, UCSD Representative
Ben Haddah, SAIC Representative
Shawn Covell, Qualcomm Representative
Terry Kuhnlein, Cushman Wakefield, Manager, Aventine Properties

Recommendation by the University Community Planning Group and Golden Triangle Coalition Task Force are:

O-54

- a. The City/Mayor's support of the Mid-coastal corridor financing should remain in the I-5 corridor.
- b. The City/Mayor should not support any additional plans for increasing density in University City until mass transit issues are solved.
- c. The City/Mayor should direct MTDB to propose a cost effective mass transit system to serve University City which would alleviate transportation problems which already exist in one of San Diego highest employment centers. This plan may provide for a Flex-trolley" system rather than light rail to ensure more rapid and effective transit deployment.
- d. The City/Mayor should support the already approved University Community Plan and the goals of the UCPG to enhance continued development of UCSD in conformance with existing plans.



PLANNING DEPARTMENT

CITY OF SAN DIEGO

MAR 29 2002

PLANNING DEPARTMENT

March 26, 2002

Ms. Anne Lowry, Senior Planner, Environmental Analysis Section
City of San Diego Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

RE: **Environmental Impact Report Comments**
City of Villages Growth Strategy/Strategic Framework Element – LDR DEIR No.
40-1027

As the City's duly-recognized community planning group for the Uptown community, the Uptown Community Planners are providing the following public comment for the draft Environmental Impact Report for the City's City of Villages strategy.

P-1 Our concerns relate to the public facilities deficits our community and other Mid-City communities currently suffer from. As noted in the Draft EIR, "the provision of adequate infrastructure and public facilities is a linchpin for the entire proposed growth strategy." Therefore, the Uptown Planners unanimously approved the following motion at our March 5, 2002 monthly meeting (copy of minutes attached):

P-2 *Uptown Planners recommend that the Board draft a letter to Council members Toni Atkins, District Three, and Byron Wear, District Two, as well as the Planning Department Staff, requesting that the Uptown Public Facilities Financing Plan (currently being drafted) be made part of the City of Villages Environmental Impact Report. This Financing Plan sets forth the major public facilities needs in the areas of transportation (streets, storm drains, traffic signals, etc.), libraries, park and recreation facilities, and fire stations as originally defined in the Uptown Community Plan dated February 2, 1988.*

Our group is currently in the process of working with City staff on an Uptown Public Facilities Financing Plan, which is in the drafting stages. We hope to have a finalized public facilities financing plan in place by summer, 2002.

P-3 Throughout the development of the City of Villages Growth Strategy, our Mid-City communities have been assured that funding to address present infrastructure deficits must be identified and in place before the implementation of the Strategic Framework Element. As you are aware, it has been estimated that the City currently has a \$2.5 billion infrastructure deficit, and the Uptown communities of Hillcrest, Mission Hills, Park West/Bankers Hill, and University Heights suffer from a deficit conservatively estimated at 62,235,500 million.

STAFF RESPONSE P-1: Comments duly noted.

STAFF RESPONSE P-2: CEQA does not require the discussion of economic effects. However, as part of the City of Villages planning effort, a draft financial consultant report entitled, "City of San Diego, Facilities Financing Report" (April 2002), has been prepared. This study outlines the possible funding mechanism to provide needed facilities on a citywide basis.

The proposed 5-Year Action Plan contains a framework for providing the needed facilities will occur through subsequent update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The forthcoming Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

The commenter's cited Facilities Financing Plan would be considered in the subsequent plan update or amendment when the proposed City of Villages strategy to guide future growth and development is proposed to be implemented in the Uptown Community Plan and potential village or corridor sites are specifically defined, located, and designated. Also refer to previous Staff Response B-25 (Paragraph 1).

STAFF RESPONSE P-3: Comments duly noted. Refer to previous Staff Response P-2 (Paragraph 1).

The following is a breakdown of the Facilities needs:

1. General Transportation -	7,165,000
2. Library -	19,555,000
3. Park and Recreation -	33,825,000
4. Fire Station -	1,690,500
<hr/>	
Total -	62,235,000

After working with staff of the Planning Department's Facilities Financing Division, we would like to bring to your attention the following preliminary public facilities deficits identified in the Uptown communities:

P-4 As our community experiences growth and densification – much of which is allowable under our current Uptown Community Plan – we would like to make the City aware of our community's needs for improved infrastructure, especially as relates to transportation, storm sewers, libraries, parks and recreation facilities and fire stations. Many of our concerns are basic – upgraded maintenance and replacement of sidewalks, streets and gutters; implementation of traffic calming measures; provision of bicycle and pedestrian-oriented opportunities; replacement of inadequately-sized library facilities; preservation of open space and provision of increased park space in our urban core; improvements in traffic circulation and coordination with hoped for transit improvements.

P-5 Uptown Planners felt compelled to provide this public comment because our community has never had a Public Facilities Financing Plan, despite our Community Plan's adoption in 1988. A draft plan is just now being processed. Adjusted facilities costs and proposals for resulting increases in the Development Impact Fee (DIF) will be determined in the coming months and may not be finalized before Planning Commission and City Council consideration of the City of Villages proposal.

On behalf of the Uptown Planners and the communities we represent, we thank you for the opportunity to comment on the City of Villages/Strategic Framework Element.

Sincerely,



Ian Epley, Chair
Uptown Community Planners

CC: Councilmember Byron Wear, District 2
Councilmember Toni Atkins, District 3
Gail Goldberg, City Planner
Pam Bernasconi, Supervising Project Manager, Planning Department
Evelyn L. Lee, Project Manager, Planning Department

Enclosures: March 5, 2002 Uptown Planners Meeting Minutes
March 21, 2002 San Diego Union-Tribune article on Infrastructure deficits

STAFF RESPONSE P-4: Comments noted. The proposed project, the City of Villages strategy, acknowledges that the infrastructure for the City is deteriorating in long-established, urban core. As part of the strategy, infrastructure is recognized as a necessary companion to any density increases. Also, a key policy recommendation is to only facilitate development patterns that can be served by adequate infrastructure.

STAFF RESPONSE P-5: Comments duly noted.

UPTOWN COMMUNITY PLANNERS MINUTES

March 5, 2002

Members Present: Bonn, de la Houssaye, Elrod, Epley, Ferrier, Gabriel, Gardner, Grinchuk, Hyde, Kapak, Sachs, Scott, Simon and Singleton

I. INTRODUCTORY ITEMS

- A. Parliamentary: All members present
- B. Agenda: Adopted by consensus after the following changes: Additions: IV. A. 0: Four way stop at Madison & Maryland; IV. A. 1. Vacation of Spruce between Falcon & Goldfinch; and IV D: 4th & Elm.
- C. Minutes of February meeting: Adopted by consensus.
- D. Treasurer's Report:
Checking Account: \$514.06
Canyon Account: \$549.36
- E. Chair's Report:

1. PDO Update: A meeting of the subcommittee will be held this evening to strategize before the meeting of the 6th. It will be open to the public. time & place to be posted on e-mail
2. The EIR for Strategic Framework is out and we have until March 12, 5 p.m. to get our comments in. A synopsis can be found on the net at sandiego gov. This is a program EIR rather than a project EIR, we need a special meeting before then to look at existing and alternatives. E. Bonn moved for a voice vote, P. de la Houssaye seconded

VOICE MOTION

Uptown Planners recommend that the Board draft a letter to Council Members Toni Atkins, District Three, and Byron Wear, District Two, as well as Planning Department Staff requesting that the Uptown Public Facilities Financing Plan (currently being drafted) be made part of the City of Villages Environmental Impact Report. This Financing Plan sets forth the major public facilities needs in the areas of transportation (streets, storm drains, traffic signals, etc.) libraries, park and recreation facilities, and fire stations as originally defined in the Uptown Community Plan dated February 2, 1988

Motion Passed Unanimously.

3. Francis Parker School will come before the subcommittee on March 18 at 4:30 at M. Singleton's office at 3915 Normal St.

II. PUBLIC COMMUNICATIONS

- A. District 2 - Council Member Byron Wear - Don Giaquinto: No report
- B. District 3 - Council Member Toni Atkins - John Latimer: 1) A budget Form sponsored by Ms. Atkins focusing on infrastructure will be held at the Normal Heights Community Ctr at 4644 Holly Blvd. on March 7, 6 to 8 p.m. 2) A traffic calming forum will be held in conjunction with the University Heights Community Assoc. meeting on April 4, at 7 p.m. in the Burney School auditorium. 3) A commendation was presented to Ian Epley thanking him for his service to Uptown Planners.
- C. Mayor Dick Murphy - Tatiana Casavantes: No report.
- D. Congress Woman Susan Davis - Todd Gloria: No report.
- E. Other Public Communications:

Uptown Parking District: Walk San Diego will meet at The Assembly of God church at 3920 Blaine St. at 9 a.m. There will be a power point presentation and a walk audit.

GRC: Issues covered at the last meeting were the EIR and Joint use between schools and parks to allow expansion of parks. Hillside grading issues were tabled until the next meeting.

Sewer Group 619: Concrete pipe replacement in Mission Hills. Contractor is on board.

SECTION 13
SAN DIEGO UNION-TRIBUNE, MARCH 21, 2002, THURSDAY

S.D.'s deferred maintenance a rough issue

The list is long, money is short

By Ray Huard
STAFF WRITER

San Diego has put off making repairs on city buildings, streets and other property for so long that it has lost track of all the work that needs to be done.

And even when officials figure it out, City Manager Michael Uberuaga told the City Council Rules, Finance and Intergovernmental Relations Committee yesterday.

there won't be enough money to pay for it all.

"We are doing an analysis of the needs. The next question is how do we pay for some of those needs," Uberuaga said. "It may require going to voters and asking for new revenue sources for deferred maintenance."

In a report released last month, a citizens' Blue Ribbon Committee on city finances said there is a backlog of more than \$300 million worth of repairs needed to buildings, streets, sidewalks, traffic lights, streetlights and other property.

But the committee said the city's

records are so inconsistent that it is impossible to produce a more precise estimate.

At yesterday's committee meeting, Mayor Dick Murphy said for the next year, at least, the best the city may hope for is to avoid getting further behind.

This year's budget cycle is going to be a challenging one," Murphy said. "Maintaining deferred maintenance is probably our best bet."

Yesterday was the second time in a month that Uberuaga said the city may have to raise taxes or fees to cope with worsening budget woes.

Richard Rider, a frequent critic of city finances, said raising taxes isn't the answer.

"What they've got to do is re-evaluate the projects already on the board," Rider said.

Rider said the council has been more interested in constructing new buildings than maintaining what it has.

In February, Uberuaga said the city faces a potential budget gap of \$15.6 million. He said he has ordered a 2 percent cut in spending for the remainder of the fiscal year, which ends June 30. At the time,

SEE NEEDS, B4

► NEEDS

CONTINUED FROM PAGE B1

City ponders increases in certain fees

he said next year's budget will be even tighter and recommended that the council look at new taxes and fees.

Also in February, the nine-member citizens' committee, which was appointed by Murphy, warned that the city must find new sources of revenue if it is to remain financially sound.

But Murphy said any recommendation to raise taxes or fees would be a hard sell to the council and the public.

As it is, Murphy said, the council already has raised sewer rates and is considering raising water rates.

"Beyond that, I don't know what will be supported by the public in this town, but nevertheless it deserves discussion," Murphy said.

The Rules Committee, of which Murphy is chairman, instructed Uberuaga to return by Aug. 31 with a list detailing needed repairs to city property along with a plan to pay for it.

"Even if we never funded another dime of deferred maintenance, we need to know what (is needed) ... and we don't really know. We have a general idea, but we don't have specific numbers," Murphy said.

In reviewing possible revenue sources, Uberuaga said, the council should take a look at fees the city charges for such things as use of recreational sites.

In theory, such fees are meant to recover direct costs associated with the use of the facilities, but Uberuaga said he suspects many have not been raised in so long that they no longer cover costs.

But Rules Committee members indicated little inclination to consider increasing recreation fees.

Councilman Byron Wear said inexpensive recreation programs are a key element to keeping youths out of trouble.

UPTOWN COMMUNITY PLANNERS MINUTES
March 5, 2002

Members Present: Born, de la Housaye, Ekrod, Epley, Farrier, Gabriel, Gardner, Grinchuk, Hyde, Kapata, Sachs, Scott, Simon and Singleton

I. INTRODUCTORY ITEMS

- A. **Parliamentary:** All members present.
- B. **Agenda:** Adopted by consensus after the following changes: Additivist, IV. A. U; Four way stop at Madison & Maryland; IV. A. 1. Vacation of Spruce between Falcon & Goldfinch; and IV. D: 4th & Elm.

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► NEEDS

CONTINUED FROM PAGE B1

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And even when officials figure it out, City Manager Michael Uberuaga told the City Council Rules, Finance and Intergovernmental Relations Committee yesterday, they won't be enough money to pay for it all.

"We are doing an analysis of the needs. The next question is how do we pay for some of those needs," Uberuaga said. "It may be quite some time before we have a new revenue source for deferred maintenance."

In a report released last month, a citizens' Blue Ribbon Committee on city finances said there is a backlog of more than \$300 million worth of repairs needed to buildings, streets, sidewalks, traffic lights, streetlights and other property. But the committee said the city's records are so inconsistent that it is impossible to produce a more precise estimate.

S.D.'s deferred maintenance a rough issue

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SEE NEEDS, B4

SECTION B
 SAN DIEGO UNION-TRIBUNE, MARCH 21, 2002, THURSDAY

Mt. Hope/Helix Ht. Residents Association
509 41st Street
San Diego CA 92102

March 26, 2002

Mr. Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Department City of San Diego
1222 First Avenue, MS 501
San Diego CA 92101

RE: The City of Villages Growth Strategy Framework Element DEIR
(LDR 40-19027/SCH No. 2001061069)

Dear Mr. Monserrate:

- Q-1 We are questioning the above captioned EIR as to its true purpose, versus what the Notice of Preparation Scoping Letter stated as to what the direction was and the agencies/organizations that responded.
- Q-2 What is lacking and most necessary is a specific adopted financial plan with identified legislation committed to provide financial resources, to achieve the goals and objectives in the Community Plans, Redevelopment Plans and to mitigate other timely issues.
- Q-3 To reach out to the future as the above captioned Strategy does, there must be a specific comparison to the current Community Plans, redevelopment plans when there are areas that are built out (especially in older neighborhoods), including population figures (current and projected). Including costs in today's dollars and in future dollars where appropriate, will ensure the meeting of the goals and objectives to mitigate current and future issues in the categories of public facilities, infrastructure, public safety services (i.e., fire department, police department), and parks.
- Where we are today Vs. the costs of the City of Villages
- Q-4 With today's dollars, we have not been able to meet certain needs. In order for the City of Villages Growth Strategies to succeed, there must be financial plan in place that takes into consideration the future value of the dollar. What will be the cost of the acquisition of land and development, building public facilities, schools, parks, and the impact of relocation of residents to achieve these intended items? Will the land be available, or will the cost be prohibitive, resulting in no action?

RECEIVED

MAR 27 2002

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STAFF RESPONSE Q-1: Refer to previous Staff Response B-2.

STAFF RESPONSE Q-2: Refer to previous Staff Response B-34.

STAFF RESPONSE Q-3: The specificity of the EIR analysis reflects the conceptual detail of the General Plan, policy-level proposal, the adoption of a new strategy to guide future growth and development. The specificity of the impact analysis conducted in the distributed EIR is appropriate for the proposed City of Villages strategy (pursuant to CEQA Guidelines Section 15146). Also refer to previous Staff Response B-5 (Paragraph 1)

STAFF RESPONSE Q-4: A framework for providing the needed facilities will occur through an update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

Mandatory Discussion Items

- Q-5 Page IV-32 Significant Impact
Not addressed: Transit Oriented Development (TOD), need to evaluate the loss of commercial and industrial businesses if they are replaced with higher density/mixed-use projects and the impacts to the adjacent residential community as to the lose of employment and the ability purchase consumer goods. (Reference: page 2 of NOP potential areas for Urban Villages).
- Q-6 Page IV-92-93 Public Health and Safety
There is an urgent need to address as to the cost of the mitigation and relocation of businesses and redevelopment areas and older communities that have abutting residential properties to businesses storing, using or generating hazardous materials that pose a health risk.
- Q-7 Page IV-94 Existing Conditions
Fifth bullet: Southeastern community: Acquire four or five, 4 to 5 parks throughout the community is not acceptable response and does not satisfy parks/recreation standards for the year 2020, for projected growth.
- Q-8 Page VII-2 School Facilities
Add to the last sentence of this paragraph: "A specific, adopted financial plan with committed financial resources needs to be included with future plans." Page VII-2 School Facilities
- Q-9 Add to the last sentence of this paragraph: "A specific, adopted financial plan with committed financial resources needs to be included with future plans." Without it the impacts will be significant and mitigated.
- Q-10 Due to the inability of the for City of San Diego to finance the needs of the City, on a timely basis and recognizing the fact, and should be respected, that some areas of the City are already built out. If the problem exists now to finance our current needs, what confidence do the citizens of San Diego have as to the ability of legislators to implement the growth of San Diego without lessening the standards that are in place now?

Thank you for the opportunity to comment for inviting comments.

Respectfully,



Reynaldo PISAÑO
Chair

STAFF RESPONSE Q-5: Proposed attached residential uses in mixed-use, compact villages would not replace commercial/industrial uses. An expressed goal of the proposed City of Villages strategy is to increase middle income employment opportunities. Refer to previous Staff Response R-3.

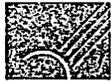
STAFF RESPONSE Q-6: The cost of remediation is included in the cost by developers to construct new projects; this applies to any new development, including future villages, which may locate on a contaminated site. The distributed DEIR disclosed a list of hazardous material sites by corridors and conceptual mitigation measures to address hazardous material impacts. Currently, public clean up of hazardous material site is a federally funded project for properties/sites listed as highly contaminated sites with eminent public health concerns.

STAFF RESPONSE Q-7: The commenter's cited "four to five" parks need in the Southern Communities is the current need, the existing condition, expressed in the adopted community plan. When the community plan is updated to implement the proposed strategy, these needs plus any future parkland as well as recreational facilities need caused by the resultant attached homes in the potential village sites would be considered.

STAFF RESPONSE Q-8: It should be noted that the school districts would be responsible for financial plans and is beyond the preview of the City. Also refer to previous Staff Responses B-58 and B-59.

STAFF RESPONSE Q-9: Comment noted.

STAFF RESPONSE Q-10: Refer to previous Staff Responses Q-4 and B-34.



SEDC

Southeastern
Economic
Development
Corporation

T 619.527.7345
F 619.261.6912

CITY OF SAN DIEGO
MAR 29 2002
PLANNING DEPARTMENT

March 26, 2002

Via Hand Delivery

Ms. Anne Lowry
City of San Diego
Land Development Review Division
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Lowry:

Re: Comment on the Draft Environmental Impact Report for the City of Villages Growth Strategy - Strategic Framework Element

R-1

The Southeastern Economic Development Corporation (SEDC) is responsible for planning and implementing redevelopment activities within the southeastern community of the City of San Diego. SEDC has four adopted Redevelopment Projects: Central Imperial, Southcrest, Mount Hope, and Gateway Center West. The area known as Dells/Imperial is in SEDC's area of influence, and is currently a study area. SEDC responded to the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) in a letter dated July 27, 2001, and our comment letter is included in Appendix A the Draft EIR. SEDC is not a responsible or trustee agency as defined by the California Environmental Quality Act (CEQA). We do however view ourselves as a partner with those trying to meet the housing needs of the City. SEDC has reviewed the above referenced EIR with specific emphasis on our previous comments, and offers the following comments on the Draft EIR.

R-2

SEDC appreciates the difficulty in preparing an EIR for a general planning document such as the City of Villages Growth Strategy - Strategic Framework Element (COV). We note that the Draft EIR does not include specific analyses in response to our NOP comments, specifically with regard to baseline conditions, environmental analysis, or mitigation measures. SEDC requested that each of the adopted redevelopment projects be considered in the EIR analysis. We understand from City of San Diego Planning staff that this was not done because the COV map is not a land use plan. We are concerned that the 4th Draft COV Map (December 13, 2001) was included with the Draft EIR and is specifically annotated as "the basis for the environmental impacts analysis of the Strategic Framework Element City of Villages Strategy." Therefore, we

STAFF RESPONSE R-1: Comments duly noted.

STAFF RESPONSE R-2: The distributed DEIR as it relates to the subject regional scope of the proposed project, the proposed strategy to guide future growth and development without any land use change, has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization.

offer the following comments in an effort to assist in clarifying the purpose of the COV and to provide early input as to the environmental analysis to be completed once land use plans are proposed. Specific recommendations are included for preparation of the Final EIR and Final Strategic Framework Element that will include the COV strategy.

Land Use - SEDC notes that the Draft City of Villages Map that accompanied the Draft EIR appears to show specific land use changes for each of SEDC's redevelopment projects and for the southeastern community as a whole. SEDC's initial reaction to the Map was to estimate the magnitude of the potential density that could be achieved under the land use changes shown on the Draft City of Villages Map. The estimated changes are summarized as follows:

Land Use Category	No Project	COV	COV Increase
Potential Residential Units	3,469	13,368 - 21,225	9,917 - 17,756
Commercial Acreage	129	0	-129
Industrial Acreage	94	0	-94

R-3 This table assumes all proposed villages would develop as residential with no industrial/commercial component. Based on this analysis, it appears that the southeastern community would absorb 48 to 58 percent of the new attached units proposed under the COV. SEDC is obviously concerned that this level of land use change would fundamentally affect the economic viability of our adopted redevelopment project areas. This issue was not analyzed in the Draft EIR. Page IV-21 of the Draft EIR states the assumption that community plans will be updated/amended to allow development consistent with the COV, and concluding there will be no significant impact. SEDC understands that the Draft City of Villages Map depicts opportunities for development consistent with the COV, and is not an actual land use plan. The actual increase in dwelling units envisioned for southeastern San Diego under the COV should be identified in the Final EIR. With this clarification, we are comfortable with the level of analysis presented in the Draft EIR; however, in the event specific land use changes are proposed, a plan-to-plan and plan-to-ground analysis is required by CEQA and was not provided in the current Draft EIR.

R-4 Page ii of the Draft EIR notes that the "proposed growth strategy would not change the existing general land uses." This appears to be an incorrect statement. The proposed growth strategy appears to provide for residential uses in areas exclusively zoned for commercial and industrial uses (e.g., Page 29 of the Strategic Framework Element states, "or multiple uses which retain commercial uses or convert to higher density residential development."). Taken at face value, a plan allowing conversion of land uses would result in a significant plan-to-plan impact because it would be inconsistent with the Southeast Community Plan, Planned District Ordinance (PDO), and SEDC's adopted redevelopment plans.

STAFF RESPONSE R-3: The commenter's interpretation of the 4th draft City of Villages map is incorrect. The distributed DEIR addressed impacts anticipated from the proposed citywide increase of 17,000 to 37,000 dwelling units above the remaining residential capacity in existing community plans. The DEIR is solely a policy-level, programmatic document. Specific locations and acreages of potential villages and redevelopment sites would be determined by subsequent community plan amendments or updates and are not required to be analyzed in this document. Implementation of specific villages will be determined during the community plan update or amendment process anticipated to begin subsequent to adoption of the proposed Strategic Framework Element and City of Villages strategy if approved by the City Council.

The commenter's table is incorrect. The proposed strategy to guide future growth and development would result in attached, auxiliary dwelling units added to existing commercial/industrial areas. There would be no change in the commercial/industrial designation or zone; some areas with large open parking areas may be subsequently parceled out and rezoned for multi-family residential uses; however, concurrently the intensity of the commercial/industrial uses may also be increased with higher allowed floor area ratios and/or lot coverage. Residential uses would not replace commercial/industrial uses. An expressed goal of the proposed strategy is to increase middle income employment opportunities.

STAFF RESPONSE R-4: Refer to previous Staff Response R-3.

We recommend:

- R-5
- Specific language be added to the descriptions of pages 28 and 29 of the Draft COV to recognize that the COV's goal is to add residential density without decreasing the availability of commercial and industrial parcels to support employment opportunities.
 - Each new project under COV be reviewed to ensure that the underlying employment generating capacity of the project site is not adversely affected by any future COV development.

R-6

Jobs/Housing Balance - SEDC is extremely concerned about the jobs/housing balance within each community. SEDC has achieved a job housing balance of 1 new job for each 1.2 new homes in the community. The City of San Diego currently has a job/housing ratio of 5 to 1. If commercial and industrial land within SEDC's sphere is allowed to develop as primarily residential, the jobs/housing balance will be dramatically affected, with new residents living in southeastern San Diego and working in another community. The COV must preserve employment opportunities in southeastern San Diego particularly those generated on industrial land where the wages are generally higher.

R-7

Transit Oriented Development Design Guidelines - It is proposed that with the adoption of the COV, the Transit-Oriented Development (TOD) Design Guidelines will be applied to all designated village areas where a discretionary permit is already required (Draft Strategic Framework Element page 37). This action will apply to all 21 villages identified in the southeastern community. The TOD guidelines are frequently not in conformance with the existing PDO, and the EIR is silent as to the environmental effects of this proposal. The TOD Design Guidelines can not be implemented at this time on parcels with incompatible zoning, with the analysis presented in this EIR. The PDO designates certain commercial areas of the community CSF. The focus of these areas is on automobile-oriented establishments where the primary commercial function is geared to single stop activity. Adopting TOD guidelines on CSF designated lands would be inconsistent with the underlying zoning and existing development, and would be a significant plan-to-plan and plan-to-ground impact.

We recommend:

- R-8
- The mitigation measure for this impact be added to revise the COV such that the TOD guidelines are not implemented on CSF-zoned land in southeastern San Diego.

STAFF RESPONSE R-5: Comments noted.

STAFF RESPONSE R-6: The City of San Diego currently has 1.4 jobs for each home (1.4:1 ratio). The proposed City of Villages strategy seeks to maintain this jobs/housing ratio. Staff concurs that it is important to preserve employment opportunities in southeastern San Diego. To this end, the land use assumptions used as a basis for analysis, have been revised to increase employment numbers in Southeastern San Diego. These numbers will need to be refined through the community plan process.

STAFF RESPONSE R-7: There are seven potential Transit Corridors and three potential Neighborhood Village Centers identified on the City of Villages Map, in the Southeastern San Diego Community Planning area. Elements of the TOD Guidelines are intended to be used on an interim basis, until any needed community plan amendments and rezoning take place. During this interim period, the TOD Guidelines will not supercede community plan density or land use recommendations. However, elements of the guidelines will be used to achieve more pedestrian- and transit-friendly designs than would likely be achieved through use of the community plan recommendations and underlying zoning alone, on a case-by-case basis.

The TOD Design Guidelines would be applied on an interim basis on areas requiring discretionary approvals; however, these design guidelines would not be applied to areas with incapable zones such as the commenter's cited CSF designated lands in the Southeastern Communities.

STAFF RESPONSE R-8: The commenter's recommended mitigation measure is not required; the project has been revised to not apply the TOD design Guidelines to the cited CSF designated lands. Refer to previous Staff Response R-7.

R-9 SEDC recommends that the existing Redevelopment Plans, PDO, and SEDC's Commercial Corridor Urban Design Guide and Multi-Family Development Guidelines should guide the siting, design, and character of redevelopment at proposed villages/corridors in the southeastern redevelopment project areas. As stated in the NOP these ordinances and guidelines should be the standard of review for the aesthetic and urban design impacts of implementing the Strategic Framework Plan in the southeastern redevelopment project areas.

R-10 Displacement and Relocation - We are also concerned that each of these village sites is comprised of numerous individual lots, frequently under separate ownership. What is the proposed mechanism to assemble the parcels required to build the villages envisioned by the COV? Is it assumed that SEDC on behalf of the Agency would assemble the necessary properties for the villages identified in southeastern San Diego? Currently the Central Imperial Redevelopment Project Area is the only southeastern San Diego project area with eminent domain powers.

R-11 With regard to defining new funding sources, the reallocation of existing resources and adjustments to certain facility standards, we note again that such standards affect the feasibility of implementing existing redevelopment projects.

R-12 Traffic - The southeastern community is already heavily impacted by traffic congestion. We agree that traffic impacts will be significant and unmitigable. We note that the Draft EIR does not attempt any street segment analysis, but only analyzes impacts to freeways. It is predicted that the Martin Luther King, Jr. Freeway will operate at Level of Service (LOS) "F" in the future. This will result in even more trips spilling onto local streets. It is important that the future community plan update EIR identify the specific street segments in the southeastern community that will be significantly impacted. This will allow these impacts to be considered by the decision-makers and overridden at that time, if the required findings can be made. This action would remove uncertainty from the redevelopment process and enable SEDC to more effectively assist the City in meeting future housing needs.

R-13 Noise - Measures to reduce indoor noise levels from local traffic likely can be incorporated into future COV development. What transportation noise mitigation will be implemented for existing development? Noise impacts and mitigation measures need to be considered by the decision-maker at the time of the future community plan update EIR; and if necessary overridden at that time, if the required findings can be made. This action would also remove uncertainty from the redevelopment process and enable SEDC to more effectively assist the City in meeting future housing needs.

R-14 Human Health - Thank you for addressing toxic hot spots related to stationary sources and existing contaminated sites. Toxic hot spots also refer to mobile sources such as emissions of diesel exhaust, a State of California carcinogen. Significant thresholds for

STAFF RESPONSE R-9: Comment noted. It should be noted that the implementation of the proposed City of Villages strategy would occur with subsequent community plan amendments and updates. The commenter's cited existing plans, PDO, and guidelines will be the standard of review for implementing the proposed strategy.

STAFF RESPONSE R-10: The proposed City of Villages strategy does not presume that land assembly will be required to implement the strategy, nor does it specify a mechanism to assemble parcels. Some potential villages sites are in single ownership, and zoning regulations would likely be a useful implementation tool along transit corridors where there are multiple owners of individual lots. Where potential villages are located in redevelopment areas, land assembly would be likely be a useful tool in some cases. Planning for specific village boundaries, land uses, and implementation strategies is recommended to occur at the required subsequent community plan and redevelopment plan level.

STAFF RESPONSE R-11: Comments noted. Also refer to previous Staff Response B-34.

STAFF RESPONSE R-12: Comments noted. Subsequent required community-level analysis will address the local street system in a traffic study and determine the impacts of any potential village site and appropriate specific mitigation.

STAFF RESPONSE R-13: Comments noted. It should be noted that in developed, urbanized areas such as the Southeastern Communities, it would be unusual that new development would cause the doubling of traffic on major roads. A doubling of traffic is needed to cause a potentially significant, detectable 3dB increase in noise levels.

STAFF RESPONSE R-14: Comments noted. It should be noted that San Diego Transit Corporation has systematically been converting their diesel burning transit bus fleet to vehicles which burn a cleaner compressed natural gas.

such impacts are typically based on the increased cancer risk, which in turn is based on the number of exposed individuals and the likelihood of cancer given exposure level and other factors. It is important that the future community plan update EIR identify how the increased transit operations and services along more densely populated corridors affect human health and safety as related to diesel exhaust emissions.

R-15 Water Quality - As we stated in our NOP comments, storm water pollution is an existing problem that is only marginally increased by new development and redevelopment. SEDC is concerned that the southeastern community, which is comprised of less than 2 percent of the City's land area, will bear an inordinate percent of the cost for storm water pollution reduction associated with the COV. As noted on page IV-63, all new and significant redevelopment projects are subject to the newly adopted SUSWMPs. This additional cost needs to be considered in the requested analysis of the effects of COV on adopted redevelopment plans.

R-16 Provision of Open Space - Implementing the COV in the southeastern community will require mitigation for highly disturbed native and non-native vegetation. SEDC is concerned that there are very limited mitigation opportunities within the southeastern community. The community will be forced to expend funds outside of southeastern San Diego to provide biological mitigation in accordance with the Multiple Species Conservation Plan (MSCP). In effect, southeastern San Diego development and redevelopment will result in open space in other communities. This issue is related to quality of life, urban form, and public facilities/services. We do not see this issue addressed in any of these sections of the Draft EIR, despite our NOP comment.

We recommend:

R-17

- The City renegotiate the MSCP such that infill developments that are consistent with the COV, are not within a MHPA, and do not affect narrow endemic or covered species are not be required to provide habitat mitigation. Rather, such projects should be required to pay a comparable cost to improve or provide additional parks or open space in southeastern San Diego.

R-18

- Alternatively, southeastern San Diego's share of future money for open space and parks should be increased proportionately to reflect this inequity.

R-19 Either of these approaches would require revisions to the recently adopted Land Development Code and Biology Guidelines.

R-20 Aesthetics and Urban Design - Most of the proposed southeastern San Diego villages and transit corridor development areas appear to be designated on half city blocks on each side of a major roadway. These blocks vary in depth, but are frequently approximately 150 feet deep to the alley. We seriously question how developers can

STAFF RESPONSE R-15: The commenter is correct; most new development would have to comply with stormwater pollution reductions. The proposed City of Villages strategy would not impose stricter requirements. The distributed DEIR disclosed the double benefit of replacing existing large parking areas with compact, mixed-use development with auxiliary attached dwelling units which may require parking structures or first level parking. The runoff in these new parking structure would be conveyed to the wastewater treatment system.

STAFF RESPONSE R-16: The mitigation of sensitive biological resources is currently required by the Environmentally Sensitive Lands Ordinance; implementation of the proposed City of Villages strategy would not impose stricter requirements or mitigation as the commenter asserted. The distributed DEIR disclosed the opportunity to keep mitigation due to water, sewer, and stormwater repair or replacement in the community by enhancing urban canyons.

STAFF RESPONSE R-17: The commenter's recommendation that the City renegotiate the MSCP is ill advised. As a minimum, this recommendation would require adjustment of the MHPA adjacency guidelines. While the MSCP covered 85 sensitive species, there are other remaining sensitive species which must be considered for required CEQA analysis of discretionary actions. The suggested change itself would require extensive CEQA review.

The distributed DEIR disclosed that the draft City of Villages Map was compared to the MSCP resources and MHPA maps to initially determine that the potential village locations would not ultimately result in adverse effects to the MHPA or sensitive species/habitats. Generally, the potential villages were identified on developed areas. All new development including those which implement the proposed strategy, would be required to pay park fees.

STAFF RESPONSE R-18: Comment noted.

STAFF RESPONSE R-19: Refer to previous Staff Response R-17. Also it should be noted that the Environmentally Sensitive Lands (ESL) Ordinance and Biology Guidelines are implementing measures of the adopted MSCP; changing the ESL may require adjustments to the Implementing Agreement with the state and federal wildlife agencies. The benefits of the commenter's recommendation may not warrant the effort to pursue this change.

STAFF RESPONSE R-20: Transit Corridor development will have different applicable regulations than village center development. The goal along transit corridors is to create a "Main Street" type experience. The City of San Diego has many successful examples (Adams Avenue, University Avenue, Goldfinch Street) of using zoning regulations to create or protect a pedestrian-friendly, "Main Street" design. Public spaces, appropriate density determinations, and site specific design recommendations will need to occur at the subsequent community plan and project specific levels. Also refer to previous Staff Responses R-3 and R-10.

provide pedestrian amenities, aesthetic elements, common space, acoustical separation, and up to 75 DUs per acre within areas that are 150 feet deep, and that back up to an alley with, frequently, a single-family neighborhood that takes access from the alley behind the corridor. It needs to be abundantly clear in all written documentation, staff reports and the adopting resolution that the Draft City of Villages Map does not represent a land use plan. The actual footprint of corridor and village development probably will be different than that shown on the Draft City of Villages map. If we are incorrect, this issue needs to be addressed now.

R-21 Alternatives - We are very concerned with the level of description of the No Project Alternative. We would like to see the No Project Alternative clearly and concisely describe the expected future conditions through the year 2020 if the proposed project is not implemented. Information such as population, persons per household, residential units, number of vehicle miles traveled, LOS and noise levels on major roads near proposed village sites, should all be estimated and presented to compare and contrast the proposed project with the No Project Alternative. We would also like such estimates for each of the alternatives considered. Factors such as population and housing units should be distributed by community planning area.

R-22 It does not appear that the EIR addresses any of the alternatives identified on page 9 of the Strategic Framework Plan. All alternatives need to clearly define which significant environmental resource impacts would be avoided or reduced. Also, the EIR needs to identify the environmentally preferred alternative (State CEQA Guidelines Section 15126.6(e)(2)). How else can the decision-makers understand the environmental effects and arrive at an informed decision as to the merits of the project and alternatives?

In the event that the Draft City of Villages Map is intended to be used in subsequent actions to implement the Strategic Framework Element, the Draft EIR is not adequate.

We recommend:

R-23 • The Draft EIR be revised to specifically address the issues raised above and recirculated for another public review period (i.e., land use, jobs/housing balance, transit oriented development design guidelines, displacement and relocation, traffic, noise, human health, water quality, provision of open space, and aesthetics and urban design). This recommendation only applies if the Draft City of Villages Map is intended to be used in subsequent actions to implement the Strategic Framework Element.

R-24 SEDC supports the City's efforts to provide additional, affordable housing, relieve congestion, and provide for a high quality of life. Density in the southeastern community currently averages approximately 15 DUs per acre. It has a tremendous

STAFF RESPONSE R-21: Refer to previous Staff Response N-3 and to following Staff Responses Qq-3 and Qq-4.

STAFF RESPONSE R-22: The commenter's cited CEQA Guidelines Section 15126.6(e)(2) states that an environmentally preferred alternative be identified only if the "No Project" alternative is the environmentally preferred alternative. The distributed DEIR determined that the "No Project" alternative is not the environmentally preferred alternative; the DEIR determined that this alternative could pose more traffic, air quality, and water quality impacts than the proposed project. In addition, the "No Project" alternative does not meet one of the major objective of the project which is to meet the expected housing shortfall in the year 2020 with affordable, mixed use attached dwelling units.

STAFF RESPONSE R-23: The distributed DEIR has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization. There is no need to revise and recirculate the DEIR.

STAFF RESPONSE R-24: Comments noted. As stated previously the commenter's assumption and calculations of resulting housing units are incorrect.

Ms. Anne Lowry
March 26, 2002
Page 7

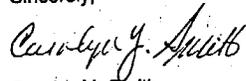
potential to supply additional DUs and employment growth through redevelopment. We feel densities of up to 25 to 30 DUs per acre may be sustainable within our sphere of influence, provided public service and support facilities are provided in support of new development. But this community cannot sustain the density we calculated given the densities presented on the Draft City of Villages Map.

It is our request that the issues we have raised will be addressed prior to this document moving forward to the decision-makers.

R-25

SEDC looks forward to continuing to work with all entities desirous of planning for the future while maintaining or improving the quality of life for all the residents of San Diego.

Sincerely,



Carolyn Y. Smith
President

CYS:kk

c: Gail Goldberg, Director,
City of San Diego Planning Department

STAFF RESPONSE R-25: Comments noted. It should be noted that the project proponents, the City Planning Department, met with representatives of the commenter, SEDC, and discussed the issues raised in this comment letter.



March 11, 2002

CITY OF SAN DIEGO
MAR 15 2002
PLANNING DEPARTMENT

STAFF RESPONSE S-1: Comments duly noted.

Mr. Lawrence C. Monserrate, Assistant Deputy Director
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, CA 92101

STAFF RESPONSE S-2: The commenter's suggested changes have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SAN DIEGO CITY OF VILLAGES GROWTH STRATEGY AND STRATEGIC FRAMEWORK ELEMENT (LDR NO. 40-1027)

Dear Mr. Monserrate:

S-1

Thank you for providing the Draft Environmental Impact Report (EIR) referenced above to the City of Chula Vista for comment. As related in previous comments on the Notice of Preparation (NOP) contained in a July 25, 2001 letter and comments on the Draft Strategic Framework Element transmitted August 28, 2001, the City of Chula Vista has a particular interest in this proposal as a directly adjacent city with numerous transportation, public facility and service, economic, environmental and other links to San Diego. In addition, with both cities in the midst of major general plan updates and several important regional planning efforts under way, outstanding opportunities exist for mutually supportive efforts on projects and initiatives that cross jurisdictional lines. The City of Chula Vista continues to support San Diego's City of Villages Growth Strategy, and appreciates the constructive interaction that has occurred amongst the staff of both jurisdictions to date.

Specific comments on the Draft EIR are presented below. Where applicable, our comments are referenced by page number and topical heading in the Draft EIR. An underline format is used to show where text is recommended to be added and a ~~strikeout~~ format is used to show where text is recommended to be deleted.

Land Use

Other Planning Efforts, Page IV-13, Otay Valley Regional Park Master Plan:

S-2

The title should be modified to recognize the adopted "Otay Valley Regional Park Concept Master Plan." The first sentence should be modified to read: "The ~~conceptual~~

Otay Valley Regional Park Concept Master Plan (1999 1999) is a joint park planning effort by three jurisdictions..."

Regional Natural Community Conservation Planning, Page IV-16, City of Chula Vista:

S-3 Modify this paragraph as follows: "The City of Chula Vista Subarea consists of 33,691 ~~33,365~~ acres. The City Subarea Plan is currently being completed and is anticipated to be approved by the USFWS and the CDFG and take authorization granted by the end of 2002 in June of 2002. Although the plan is still in draft format, development has continued to occur within Chula Vista along with land conveyance as mitigation for impacts. As of January, 2002, approximately 3,967 acres of habitat were targeted for impact and a total of 9,231 acres of habitat were targeted for conservation as permanent open space, with as much as 4,331 acres of this area outside the City of Chula Vista. ~~occurred within Chula Vista that has affected the MHPA within the City. As of September, 2001, approximately 3,936 acres were impacted and a total of 9,461 acres of habitat, have been preserved as permanent open space.~~

Adjoining Jurisdictions, General Plan Updates, Page IV-19, City of Chula Vista:

S-4 This section should be revised as follows: "The City of Chula Vista has initiated a comprehensive ~~begun to review its General Plan for possible amendment or update,~~ specifically to meet the projected regional shortfall in dwelling units to accommodate population increases. Most ~~The~~ currently planned growth in the City would occur in large master planned communities in eastern Chula Vista, including the 23,000-acre Otay Ranch; ~~This expansion area has an expected a minimum population of approximately 68,000. The build out of this eastern community is expected to occur area may extend beyond 2020. Otay Ranch. This area has been planned as a series of villages with core densities averaging from 14.5 to 18 dwelling units per acre (gross) depending on whether planned transit ways traverse the villages. Ranging from 18 to 25 dwelling units per acre and in these villages, reserved rights-of-way for future rapid transit extensions have been reserved.~~

S-5 The General Plan update will examine existing neighborhoods to determine what areas are likely to remain stable and where transitional areas exist where revitalization AND intensification may be appropriate to accommodate future anticipated growth. ~~Any needed additional housing capacity would be planned in~~ This would focus upon some of Chula Vista's older portions, generally west of I-805 and along I-5. These areas are include the City of Chula Vista's urbanized core and are becoming ripe for redevelopment areas, and some of the prime candidates for infill projects with mixed use and higher densities.

S-6 A joint South Bay Transit First Program with the Metropolitan Transit Development Board, Chula Vista and other jurisdictions is refining proposed transit routes and station

STAFF RESPONSE S-3: The commenter's suggested changes have not been made. The commenter's deleted acreages as those reported in the latest official annual MSCP Status Report; this is true for acreages reported by the City of San Diego and the County. The distributed DEIR used these acreages because they were officially presented in a public meeting last year.

STAFF RESPONSE S-4: The commenter's suggested changes are appreciated and have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

STAFF RESPONSE S-5: The commenter's suggested changes are appreciated and have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

STAFF RESPONSE S-6: The commenter's suggested changes are appreciated and have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

locations to provide a framework for identifying areas where transit supportive land uses are most appropriate in this area.

S-7 Chula Vista may ~~reduce~~ modify the previously forecasted need for approximately 9,000 residential units based upon SANDAG's Preliminary 2030 Regional Forecast, which has indicated a lower regional need for housing units than the Region 2020 forecast.

S-8 In considering the possible outcomes of the growth management policies of these adjoining jurisdictions, the combined effects of the City of San Diego, Chula Vista, and the County to accommodate continued growth may result in adverse effects to regional traffic congestion and air quality. Whatever the eventual consequences, San Diego, Chula Vista, and the County are connected in assembling the subregional habitat preserve and planning the regional park system and laying the groundwork for improved connections in hopefully, will be connected by an expanded regional transit system."

We feel that a transit system as generally envisioned in the Regional Transit First network is essential to fully realize the City of Villages Strategy.

Transportation/Circulation

Page IV-32, Significance of Impact:

S-9 This section states, "The modeling indicated only about a six percent reduction in all travel trips attributable to transit use and walking." The reader is left with the impression that the City of Villages Strategy would yield relatively modest gains. We believe this understates the potential role of an enhanced transit system and supportive land use and design in addressing future traffic mitigation. Likewise, we feel that the City of Villages Strategy's "conservative limited effect" on increased walking and transit use cited at the bottom of Page IV-32 inappropriately downplays the relationships among land use, design and travel behavior.

Cumulative Effects

Page VI-3, Adjoining Jurisdictions – General Plan Efforts:

S-10 As requested for similar language in Part IV of the Draft EIR, modify the second sentence of this section to read: "Whatever the eventual consequences, San Diego, Chula Vista, and the County are connected in assembling the subregional habitat preserve and planning the regional park system and laying the groundwork for improved connections in hopefully, will be connected by an expanded regional transit system."

STAFF RESPONSE S-7: The commenter's suggested changes are appreciated and have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

STAFF RESPONSE S-8: The commenter's suggested changes are appreciated and have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

STAFF RESPONSE S-9: The modeling results have been reconsidered and changed from the commenter's cited six percent in the distributed DEIR to 9% to 10% attributable to transit use, walking, and bicycling. The results and DEIR discussion may downplay the relationships among land use, design, and travel behavior, but pursuant to CEQA, the quantified results of the traffic modeling was used as the basis for the appropriate determination that the transit use, walking, and bicycling attributable to the proposed City of Villages strategy is only partial mitigation. Qualitative benefits were not used as viable mitigation. The determination for regional traffic impacts remain significant and unmitigated. With subsequent specific village locations, concurrent, refined transit, and traffic modeling which can handle specific transit factors, results are expected to, as a minimum, improve local traffic impacts, if not, mitigate them.

STAFF RESPONSE S-10: The commenter's suggested changes are appreciated and have been made to the Final EIR. These changes are clarifications and do not change the analysis or determinations of the distributed DEIR.

General Comment

The Draft EIR's level of generality makes evaluating and commenting on specific topical area impacts, such as those on roadways, water resources, the sewer system, storm water drainage, solid waste disposal and energy, difficult. More specific analysis is largely deferred to subsequent environmental reviews. We look forward to opportunities to participate in these subsequent reviews.

S-11

We likewise look forward to working with the City of San Diego as other actions to implement the Strategic Framework are carried out, and particularly any updated community plan (such as the Otay Mesa Community Plan currently being updated cooperatively with the City of San Diego), 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) 409-5959.

Sincerely,



Mark Stephens
Principal Planner

cc: George Krempf, Assistant City Manager
Robert A. Leiter, Director of Planning and Building
Chris Salomone, Director of Community Development
John Lippitt, Director of Public Works
Marilyn Pongeggi, Environmental Review Coordinator
Ed Batchelder, General Plan Project Manager
Duane Bazzel, Principal Planner

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STAFF RESPONSE S-11: The specificity of the EIR analysis reflects the conceptual detail of the General Plan, policy-level proposal, the adoption of a new strategy to guide future growth and development. The specificity of the impact analysis conducted in the distributed EIR is appropriate for the proposed City of Villages strategy (pursuant to CEQA Guidelines Section 15146). Also refer to previous Staff Response B-5 (Paragraph 1).

Comments duly noted. The City of San Diego appreciates the City of Chula Vista's wish to continue to work cooperatively. The City of San Diego also would like to participate in any environmental review that the City of Chula Vista conducts on the update of the Chula Vista General Plan to implement smart growth principles on urbanized core areas which are prime candidates for infill and higher densities.



CITY OF LEMON GROVE

"Best Climate On Earth"

Community Development Department

March 4, 2002

Ms. Anne Lowry
City of San Diego
Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

CITY OF SAN DIEGO
MAR 13 2002
PLANNING DEPARTMENT

Re: The Draft Environmental Impact Report for the City of Villages Growth Strategy.

Dear Sir:

T-1 The City of Lemon Grove appreciates the opportunity to review and comment on the DEIR for the City of Villages Strategic Framework Element. The City is supportive of the concept of the City of Villages, however has some concerns regarding indirect and cumulative traffic and circulation impacts within the City of Lemon Grove.

Proposed Neighborhood Village Center

T-2 You have identified an area within the Mid-City Eastern Area, located at College and SR94, as a future Neighborhood Village Center. This future Neighborhood Village is adjacent to the City of Lemon Grove's northern jurisdictional boundary. This area currently encompasses multi-family dwellings and a regional shopping center (College Grove Center). Neighborhood Village Centers are defined in the City of San Diego's General Plan as neighborhood-oriented areas with local commercial, office, and multifamily residential buildings, including mixed-use with a proposed density of 45 dwelling units per acre.

T-3 Since the revitalization of this regional retail center (College Grove Center) with primarily big box retail businesses, the City of Lemon Grove has experienced an excessive amount of traffic congestion on eastbound Federal Blvd/Broadway to Massachusetts Avenue to access eastbound SR94. This route from the commercial center through the City of Lemon Grove provides the only access point to east SR94 for the residents and customers of the College Grove Center area. The intersection of Broadway and Massachusetts currently operates at a Level of Service of "F" during peak hours and experiences traffic congestion throughout the day. The revitalization of College Grove Center has resulted in significant and direct traffic impacts in the City of Lemon Grove in which no consultation or mitigation was offered or considered during the revitalization process.

T-4 The implementation of the Neighborhood Village Center in the College Grove Center area will result in additional direct and significant traffic impacts within the City of Lemon Grove. The Transportation/Circulation section of this DEIR does not adequately evaluate the potential traffic

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619.825.3805 FAX 619.825.3818 www.ci.lemon-grove.ca.us

STAFF RESPONSE T-1: Comments duly noted.

STAFF RESPONSE T-2: The City's proposed Strategic Framework Element/City of Villages strategy does not result in any land use change, specify any potential village locations, or increased mixed use residential densities. The implementation of the proposed strategy to guide future growth and development would occur only with subsequent community plan amendments or updates.

STAFF RESPONSE T-3: It should be noted that cumulative traffic impacts in the vicinity of College Grove and specifically in the vicinity of the cited intersection can not be solely attributed to redevelopment in College Grove; it appears that the City of Lemon Grove has permitted numerous, large commercial uses along Broadway.

STAFF RESPONSE T-4: Adverse traffic effect from the cited potential village center will be determined when the community plan for Eastern Area is either subsequently amended or updated and when required second-tier, CEQA environmental review is conducted. The distributed DEIR addressed traffic on a regional level due to the fact that the proposed strategy would not result in any land use change or specifically site any village location.

related impacts on adjacent jurisdictions that would be a direct result of the implementation of the City of Villages. Specifically, the DEIR does not evaluate the direct impact on the City of Lemon Grove from the additional trips associated with the future dwelling units (45du/ac), potential mixed-use, and an overall increase in the intensity of land uses in the area. Additionally, it does not consider the cumulative effects on the City of Lemon Grove.

T-5

It was also noted that the DEIR states: the potential additional 17,000 to 37,000 detached homes which could result as the proposed City of Villages is implemented could ultimately generate 180,000 to 240,000 additional trips and would pose a significant direct and indirect traffic impacts (page IV-32). It is also unclear if this DEIR only evaluated the potential "detached homes" and did not take into account additional trips associated with multi-family dwelling units and/or mixed-use development, or, if this is a clerical error.

T-6

The City recommends that the DEIR include mitigation measures that require; 1) the notification of and consult with neighboring jurisdictions and agencies regarding all future development in the College Grove area associated with the implementation of the City of Villages Plan; 2) the notification of all subsequent implementing discretionary actions such as community plan amendments, rezones or permits, and 3) the implementation of methods to assure mitigation of all impacts on the City of Lemon Grove by development in the College Grove area. These mitigation measures will allow adjacent jurisdictions and agencies to participate in the CEQA process to ensure adequate mitigation of significant impacts as well as provide for improved coordinated regional planning efforts.

T-7

In closing, the City of Lemon Grove commends the City of San Diego's efforts to address the housing needs of the region and looks forward to working with the City with its implementation efforts.

Sincerely,



Robert W. Larkins
Acting Community Development Director

Cc: Bob Richardson, City Manager
City Council

STAFF RESPONSE T-5: The cited "detached" homes are typographical errors. The proposed City of Villages strategy would ultimately result in compact, mixed use villages with "attached homes". This error has been corrected in the text of the Final EIR. The analysis of the DEIR considered the buildout of 17,000 to 37,000 attached homes by the year 2020.

STAFF RESPONSE T-6: It is the policy of the City of San Diego, Development Services Department, Environmental Analysis Section that adjoining jurisdictions are notified during the public review period of distributed environmental documents for any proposed project which may affect adjoining jurisdiction. The commenter's cited mitigation regarding notification is not CEQA mitigation; it is CEQA procedure which the City of San Diego must follow.

Also refer to previous Staff Responses T-3 and T-4.

STAFF RESPONSE T-7: Comments duly noted.

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
(619) 441-4030

CITY OF SAN DIEGO
MAR 13 2002
PLANNING DEPARTMENT

March 12, 2002

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

RECEIVED

MAR 12 2002

Planning & Development Review

THE CITY OF VILLAGES GROWTH STRATEGY - STRATEGIC FRAMEWORK ELEMENT: DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Lowry,

Thank you for providing us with an opportunity to review the *Draft Environmental Impact Report (DEIR) for the Strategic Framework Element of the City's General Plan and Progress Guide*, dated January 2002. County Department of Planning and Land Use (DPLU) and Department of Public Works staff have completed their review and have the following comments regarding the content of the DEIR:

DEPARTMENT OF PLANNING AND LAND USE COMMENTS:

- U-1 | 1. Page 9 of the Strategic Framework refers to four alternatives that were considered, but these alternatives do not match the DEIR alternatives. The alternative of annexing land in (for example) East Otay Mesa is not discussed anywhere, and it is unclear how that would help achieve the City's goals. This is of concern because of the statement that "the positive and realistic aspects of the other alternatives should also be incorporated into the City's strategy." Without further explanation, the annexation of East Otay Mesa should be deleted as an example.
- U-2 | 2. It is unclear which map is being added to the City's General Plan. The only map contained in the booklet on page 26 lacks the detail of the map included in the DEIR.

STAFF RESPONSE U-1: The distributed DEIR did not address/cover the commenter's cited alternative which would include annexation, acquisition and conversion; the other three alternatives are included in varying degree in the proposed strategy and are generally covered by this DEIR. One clarification is that this DEIR adequately covered the proposed City of Villages strategy, a proposal which would not result in any land use change.

Also note that the "Prospective Annexation Area" Map in the current Guidelines for Future Development will be updated with current data, but that East Otay Mesa is still proposed as a prospective annexation area in the proposed City of Villages Strategy.

STAFF RESPONSE U-2: It should be noted that any version of the draft City of Villages map is not a land use map.

The generalized map contained in the Strategic Framework Element and the illustrative map in the action plan were utilized for the EIR analysis only, and do not mandate any land use.

- U-3** 3. There are several references to amending the City's General Plan subsequently (page 23, adding an Economic Prosperity Element; page IV-97 of the DEIR regarding amending Recreation Element Guidelines; and DEIR page IV-67 discusses updating the Conservation and Environmental Elements). In our experience, it is unwise for a General Plan to contain policy direction to amend itself; this may be viewed as deferred mitigation.
- U-4** 4. Page IV-13 of the DEIR states that there are adopted CLUPs for three airports and a draft CLUP for Brown Field. This statement should be corrected because there is also an adopted CLUP for Brown Field. The existence of the draft CLUP is not relevant because it does not govern land use and it does not appear to be progressing through the hearing process.

DEPARTMENT OF PUBLIC WORKS COMMENTS

- U-5** 1. The EIR should identify what assumptions were made for Vehicle Occupancy Rates (VOR), transit ridership, and roadway capacity enhancements from Intelligent Transportation System (ITS) improvements in the Year 2020 forecast.
- U-6** 2. To the extent possible, the EIR should include figures that illustrate the projected traffic volumes for the roadway segments assessed in the EIR.
- U-7** 3. The EIR should identify any Circulation Element road reclassifications that proposed as part of the City's plan.
- U-8** 4. The City of San Diego should coordinate with the County to ensure consistency in the classification/design of Circulation Element roads, bicycle network corridors, and transit routes that traverse both jurisdictions.
- U-9** 5. The EIR should clearly identify roadway segments that traverse areas adjacent to the City's jurisdiction that currently or are projected to operate at an inadequate LOS.
- U-10** 6. The EIR should elaborate on the phasing plan for the development of the Village Centers. In the absence of significant roadway improvements and construction, the EIR should address what proposed transit improvements are recommended in conjunction with the plan's phased development in order to offset future traffic impacts.

STAFF RESPONSE U-3: In strictly environmental review context, environmental tiering review of phased planning approval is consistent with CEQA. The cited subsequent General Plan Elements are not credited in the distributed DEIR as mitigation for any analyzed impact.

STAFF RESPONSE U-4: The commenter is correct; there are four adopted CLUP's within the City of San Diego. However, it should be noted that the City of San Diego Airports Division is currently proceeding with updating the Airport Master Plan for Brown Field which may require an updated CLUP.

STAFF RESPONSE U-5: SANDAG's Regional Transportation Plan estimates/assumes that commenter's cited Intelligent Transportation System would improve the overall effectiveness of the regional transportation system by a minimum of 10 percent over the next 20 years. This estimate/assumption does not change the distributed DEIR determination that the proposed strategy's regional traffic impact is only partially mitigated and that the impact is significant and unmitigated.

STAFF RESPONSE U-6: The main focus of the distributed DEIR was the proposed strategy's impact on the regional freeway system; the year 2020 freeway congestion map from SANDAG's 1998 Regional Transportation Plan was included in the DEIR. This map incorporated the 2020 forecast which is currently being decreased with the preliminary 2030 forecast; this map along with the included discussion and tables are an adequate (possibly worst-case) depiction of the project's regional impacts.

STAFF RESPONSE U-7: The proposed City of Villages strategy would not result in any change to Circulation Element roads: the distributed DEIR did not address any changes to roadway classifications.

Any Roadway reclassifications will be addressed in the circulation element which will be updated subsequent to adoption of the Strategic Framework Element.

STAFF RESPONSE U-8: Comments noted.

STAFF RESPONSE U-9: The proposed strategy would have phased implementation with required, subsequent community plan amendments or updates to specifically site village locations and designate densities/intensities. At this subsequent, discretionary planning stage community-level analysis including a more detailed traffic and transit study would be conducted and included in the required, second-tier environmental document. Without specific village locations and land use entitlements, it would be too speculative for this EIR to analyze the commenter's requested analysis.

STAFF RESPONSE U-10: The proposed strategy does not contain/detail the commenter's "phased plan for the development"; the strategy does propose phased implementation with required, subsequent community plan amendments or updates to specifically site village locations and designate densities/intensities. At this subsequent, discretionary planning stage community-level analysis including a more detailed traffic and transit study would be conducted and included in the required, second-tier environmental document. Without specific village locations and land use entitlements, it would be too speculative for this EIR to analyze the commenter's suggested detailed mitigation.

U-11

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 Final EIR for review or providing additional assistance at your request. If you have any questions regarding these comments, please contact me at (858) 694-2962.

STAFF RESPONSE U-11: Comments duly noted.

Sincerely,

 Environmental Coordinator

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

GLP:JEG:CM

NATIVE AMERICAN HERITAGE COMMISSION

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



February 28, 2002

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

CITY OF SAN DIEGO
 MAR 06 2002
 PLANNING DEPARTMENT

RE: SCH# 2001061069 - The City of Villages Growth - Strategic Framework Element, City and County of San Diego

Dear Ms. Lowry:

The Native American Heritage Commission has reviewed the above mentioned Draft Strategic Framework Element. Page IV-79 contains mitigation measures for the plan. While the Commission endorses the measures presented, the Commission recommends the following additional steps to mitigate project-related impacts on archaeological resources:

- V-1 | Contact the Native American Heritage Commission for a list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
- V-2 | Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- V-3 | Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- V-4 | Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 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.

If you have any questions, you may telephone me at (916) 653-4040.

Sincerely,

Rob Wood
 Environmental Specialist III

CC: State Clearinghouse

STAFF RESPONSE V-1: It is the policy of the City of San Diego, Development Services Department, Environmental Analysis Section that all Native-American tribes in San Diego County and adjoining northern counties are notified during the public review period of distributed environmental documents for any proposed project which may potentially affect archaeological resources. (See the attached DEIR distribution list for the Native American tribes notified.)

STAFF RESPONSE V-2: The distributed DEIR disclosed conceptual mitigation measure criteria; these conceptual measures are consistent with CEQA for projects such as the proposed strategy to guide future growth and development, which do not result in any land use change and does not specifically site development (village) locations. With subsequent, separate site-specific environmental review, where deemed appropriate, specific mitigation measures, including the cited monitoring, identification, and evaluation requirements, would be required.

STAFF RESPONSE V-3: Refer to previous Staff Response V-2.

STAFF RESPONSE V-4: The City of San Diego is well aware of the citations regarding discovery of burials. There are areas within the City jurisdiction where burial sites are known. Also refer to previous Staff Response V-2.

DEPARTMENT OF TRANSPORTATION

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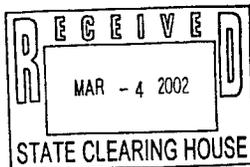
CITY OF SAN DIEGO
MAR 07 2002
PLANNING DEPARTMENT



Flex your power!
Be energy efficient!

March 4, 2002

Mr. Scott Morgan
CA State Clearing House
1400 Tenth Street
Sacramento, CA 95814-5502



Clear
3/4/02
e

RE: Draft Environmental Impact Report (EIR) for the City of San Diego's "City of Villages" Growth Strategy -- Strategic Framework Element (SCH No. 2001061069)

Dear Mr. Morgan:

W-1

The Department of Transportation (Department) appreciates the opportunity to comment on the Draft EIR for the Strategic Framework Element of the City of San Diego's Progress Guide and General Plan ("City of Villages"). 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 neighborhoods and communities.

W-2

The manner in which land is developed can have a profound effect on the viability of alternative transportation options. The Department supports a "smart growth" concept which includes compact, mixed-use centers designed at a human (pedestrian / bicycle) scale enabling residents and visitors to achieve a high level of mobility. Within a context of good urban design and "smart growth" principles, the proposed "City of Villages" can help to increase mobility and reduce traffic and congestion on State transportation facilities by providing functional alternatives to the automobile.

W-3

In order to create more efficient and livable communities, bicycle, pedestrian, and transit planning should be integrated into long-term comprehensive land use planning efforts in San Diego. The City has a near-perfect climate year-round. Creating pedestrian-scale Villages linked by a network of interconnected trails or bicycle routes would allow

STAFF RESPONSE W-1: Comments duly noted. Staff concurs with the stated strong link between transportation and the pattern of land use and recognizes the challenge to improve the mobility of San Diegans while enhancing the quality of life.

STAFF RESPONSE W-2: Comments duly noted. While the distributed DEIR determined that the modeled citywide effects of transit, walking, and biking were only partial mitigation, it is hoped that with more detailed, refined analysis at the subsequent community and site-specific levels, the design features and amenities of subsequent village-type development would not only promote walking, bicycling, and bus ridership by the residents of the mixed use, attached homes within the village but also lure the surrounding neighbors out of the personal vehicles for shorter, non-work trips.

STAFF RESPONSE W-3: Comments duly noted. Staff recognizes the unique opportunity that the San Diego region presents to create efficient and livable communities; the initial step within the City to make this vision a reality is the proposed Strategic Framework Element/City of Villages strategy. The proposed Strategic Framework Element contains expressed policies to promote pedestrian and bicyclist-friendly design, to locate commercial uses to be accessible by walking or bicycling, and promote interconnected street/trail network to enhance walkability and bicycling.

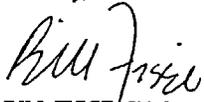
Mr. Scott Morgan
March 4, 2002
Page Two

STAFF RESPONSE W-4: Comments noted. The distributed DEIR showed the 2020 freeway congestion with the completed portions of the connected SR-56 and the extended SR-125. The City of Villages map in the Final EIR has been revised and now contains these freeway segments. CALTRANS' support of the City's smart growth efforts is appreciated.

residents to walk or ride to a variety of destinations. The City should consider setting a goal for a percentage increase in the number of bicycling / walking trips once the Villages are in place. The City should also look into the greater provision of bicycle parking facilities, especially in Village areas. The City can further facilitate connection between Villages by providing accomodation for transit through signal priority measures and enhanced urban (transit-oriented) design.

W-4 The Department notes that the City of Villages map is missing a few elements which are important to the overall transportation framework of the region. Most existing highways are shown, but as-yet-unconstructed routes with approved funding are missing, such as SR-125 and SR-56 (center portion). Existing and proposed light rail trolley and other future transit lines are also missing from the map. The Department encourages the City to ensure the General Plan Strategic Framework Element is consistent with SANDAG's Region 2020 concept, MTDB's TransitWorks, and the City's own Transit Oriented Development (TOD) Design Guidelines. In general, the Department 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,



BILL FIGGE, Chief
Development Review and Public Transportation Branch



GOVERNMENTAL AND COMMUNITY RELATIONS
SUSAN L. TAYLOR, DIRECTOR

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March 25, 2002

CITY OF SAN DIEGO

MAR 29 2002

PLANNING DEPARTMENT

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

Re: City of Villages Growth Strategy / Strategic Framework Element Draft
Environmental Impact Report (LDR No. 40-1027 / SCH No. 2001061069)

Dear Ms. Lowry:

The above-referenced documents and draft EIR have been received and reviewed. The University of California, San Diego (UCSD) submits the following comments.

X-1

The issues and prudence that require the City of San Diego to engage in long-term land use planning provide the same motivation for UCSD to undertake similar activities. The planning for the future of the 1200-acre campus and its projected 2015 daily population of about 50,000 is not unlike the planning for a community plan area. The campus certainly represents an area larger than most, if not all, newly designated future "villages". However, within the City of Villages plan and strategy, the UCSD campus is subsumed within some larger grouping of "existing" development.

X-2

In fact, the North University City community and the UCSD campus are areas of emerging and continuing development that evolve for at least the next ten years. The University community plan area will be developed with several thousand more multi-family residences, at least 2.5 million square feet of office and scientific research space, and approximately 1,000 hotel rooms. The UCSD campus will grow to include almost 30,000 students and 20,000 faculty and staff members. The campus will be developed

STAFF RESPONSE X-1: Comments noted. While it is acknowledged that walking, biking, and shuttle opportunities are readily available for on-campus travel, staff hopes that UCSD expansion plans include coordination with MTDB to incorporate vastly improved, viable transit links to UTC and students living off-campus in North University City with innovative, successful incentives to lure staff and students out of their personal motor vehicles, such that off-campus, traffic congestion does not appreciably worsen. The City would appreciate receiving any environmental documents required for future campus expansion plans if and when these documents are prepared for amendments to the LRDP and released for public review. When the proposed City of Villages strategy is implemented through a community plan amendment or update in University City, existing and planned traffic generated by UCSD will be accounted for in subsequent community-level, traffic modeling and analysis. The UCSD campus is subsumed with existing development in recognition of the fact that the City has no land use jurisdiction on the University of California land.

STAFF RESPONSE X-2: Comments noted.

with about 19 million square feet of classrooms, research laboratories, offices, public spaces, retail activities, and housing and dining facilities. Approximately 13,000 students will live in campus housing facilities and daily traffic volume is expected to exceed approximately 100,000 ADT.

X-3 All of the campus and community development described above will occur within the context of the UCSD Long Range Development Plan (LRDP) and the University Community Plan. The LRDP and the community plan have been integrated in a fashion that provides for consistency. The campus population and ADT are consistent with the limits set in the community plan and the community plan provides for UCSD growth, as well as the buildout of the rest of the community.

X-4 The traffic analysis that accompanies the community plan indicates that buildout levels-of-service within the community will be at less than acceptable levels; in fact, the community plan and the UCSD LRDP were both adopted with "overriding considerations". Additionally, there are numerous transportation improvements planned and financed through the Facilities Benefit Assessment (FBA) process.

X-5 Traffic impact is the key concern that attaches to the proposal for the institution of new "villages" in the University Community area. First, current projections of future traffic congestion levels will undoubtedly be increased through the introduction of additional development and density into the community. Even if this additional traffic is mitigated by the improvement of mass transit in the area, there will be additional impacts to a situation that has already been determined to be "unmitigable" through the community plan environmental review process. Consequently, this additional development would seriously affect the quality of this area and could limit UCSD's ability to expand and continue to provide the high-value growth and regional economic benefit that has been the historic case.

X-6 Therefore, we request that the necessary analysis be performed to evaluate the impact of additional development and density beyond the levels already specified in the community plan. Additionally, necessary mitigation measures (other than mass transit improvements) should be specified to provide levels of service equivalent those already approved in the community plan. In this regard, there should be a determination of the specific improvements required (and the environmental consequences of such improvements) for additional mitigation.

X-7 If improved mass transit measures are proposed as mitigation for additional development, then the environmental analysis should contain phasing and limitation measures to ensure that the mitigation occurs in advance of the new development. An assessment of roadway levels of service following implementation of mass transit measures should be part of the environmental analysis, together with additional necessary roadway mitigation measures.

STAFF RESPONSE X-3: Comments noted.

STAFF RESPONSE X-4: Comments noted. The only remaining viable, untried solution is extensive public transit improvements to allow transportation modal choice and increased facilities to improve walkability and bicycling to lure motorists out of personal vehicles. These solutions are an integral part of the City's proposed City of Villages strategy. As stated previously, staff hopes that UCSD expansion plans include coordination with MTDB to incorporate vastly improved, viable transit links to UTC and for students living off-campus in North University City such that off-campus, traffic congestion to somewhat offset the alluded unmitigated traffic impacts outside the campus and in the surrounding City of San Diego.

STAFF RESPONSE X-5: It appears from previous comments that the cited UCSD's expansion proposal is consistent with the adopted LRDP; the statement that the City's proposed strategy "could limit UCSD's ability to expand" appears inconsistent. If these statements hint at required, additional discretionary approvals, staff would urge that UCSD expansion plans include coordination with MTDB to incorporate vastly improved, viable transit links to UTC and for students living off-campus in North University City with innovative, successful incentives to lure staff and students out of their personal motor vehicles, such that off-campus, potential future traffic congestion is reduced. If amendment to the adopted LRDP is required, the associated CEQA review must reconsider the university's contribution to community traffic, and considering the current traffic congestion, vastly improved transit is the only viable mitigation.

STAFF RESPONSE X-6: The commenter's suggested community-level traffic analysis is not required for the City's EIR which appropriately addressed the solely policy-level impact of a proposed City of Villages strategy, a proposal which would not result in any land use change or site any potential village locations. Also refer to previous Staff Responses 0-15 and 0-41.

STAFF RESPONSE X-7: Improved transit was modeled and the citywide results were included in the distributed DEIR; the model results showed nearly 16% transit trips during peak hours and 4% of all trips. The estimated rate of use was determined to only partially mitigate a significant regional traffic impact. Traffic including improved transit, would be modeled and analyzed with more detail in subsequent environmental review for implementing community plan updates or amendments. These transit improvements in place prior to potential village-type development, would be an existing offset and not a mitigation measure; and it would still be a viable mitigation measure if transit improvements were to occur concurrently with development. In addition, another appropriate mitigation, could be development phased with phased transit improvements.

X-8

We appreciate the opportunity to provide these comments. UCSD wishes to be a cooperative partner with the community and the City of San Diego in the provision of additional housing opportunities and the City of Villages. However, care should be taken to make certain that these potential additional developments do not negatively impact the implementation of existing and already adopted community plans.

Sincerely,

A handwritten signature in cursive script that reads "Susan L. Taylor". The signature is written in dark ink and is positioned above the printed name.

Susan L. Taylor

STAFF RESPONSE X-8: Comments duly noted. Staff appreciates UCSD's wish to be a cooperative partner with the community and the City. Refer to previous Staff Response X-7.



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

RECEIVED

11011.10D JAN 15 2002
G-5/40-102712
January 7, 2002

STAFF RESPONSE Y-1: Comments duly noted.

CITY ADMINISTRATION BUILDING
ATTN GAIL GOLDBERG
202 C STREET MS 5A
SAN DIEGO CA 92101

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

Dear Ms. Goldberg,

Y-1

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.

Y-2

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,

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

STAFF RESPONSE Y-2: The City's proposed Strategic Framework Element/City of Villages strategy avoided identifying any potential village sites in the influence area of MCAS Miramar, that could be adversely effected by military aircraft.



San Diego County Archaeological Society

Environmental Review Committee

17 March 2002

CITY OF SAN DIEGO
MAR 25 2002
PLANNING DEPARTMENT

To: Ms. Anne Lowry, Senior Planner
Land Development Review Division
Planning and Development Review Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
The City of Villages Growth Strategy – Strategic Framework Element
LDR No. 40-1027

Dear Ms. Lowry:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

- Z-1 Looking at the Historical Resources section of the DEIR, it is hard to know where to start listing the problems. It is clear that the authors knew nothing of local prehistory and history. Spelling and grammar in the section betray a rushed effort, carelessness, or both. (Surely someone could have taken the time to run spell and grammar checking, or just proofread it, before sending this document to press.) The product of their efforts is inaccurate, incomplete, and probably culturally insulting to the Kumeyaay—which name is consistently misspelled in the DEIR. Here are a selected few of the problems with the treatment of Prehistory in Section I:
- Z-2 • The second paragraph under "Prehistory" refers to "crude stone grinding tools". The authors' use of "crude" is unnecessarily judgmental. The same paragraph also refers to burials at La Jolla Farms, as though that's the only place.
- Z-3 • In several places, Section I cites "questions" and things that "have not been determined", yet addressing answering these questions, or even asking them more sensitively, seems not to have been part of the authors' thoughts.
- Z-4 • The third paragraph under "Prehistory" states that the "Kumeyaay" "also used bow and arrows with points made of obsidian from Imperial County and pottery." One assumes they didn't mean that arrows sometimes had points made of pottery, but that's what they said. Later in the same paragraph, they refer to "urns" and "scapers". It would be interesting to know their reference for the use of "urns" but, unlike some other sections, nothing in Section I is referenced.

STAFF RESPONSE Z-1: Comments noted; these comments do not address the adequacy of the distributed DEIR or its determinations. The cited accepted spelling of "Kumeyaay" has been inserted into the text of the Final EIR. It should be noted that the "correctness" of the commenter's cited "misspelling" of a Native American name from an ancient language which was an oral tradition into an anglosized word phonetically spelled with the English alphabet, is moot at best and may be culturally insulting at worst.

STAFF RESPONSE Z-2: Comments noted; these comments do not address the adequacy of the distributed DEIR or its determinations.

STAFF RESPONSE Z-3: Comments noted; these comments do not address the adequacy of the distributed DEIR or its determinations.

STAFF RESPONSE Z-4: The commenter for one, can reasonably assume that "they" did not mean arrows with pottery points or the converse, pottery made of obsidian. The distributed DEIR used previous City environmental documents for the brief summary of prehistory and history. The reference for the use of urns are from several sources; one specific source is Dr. Philip Pyrde's "San Diego: An Introduction to the Region" (1992); in Chapter Four of this book, in a section entitled, "Native American Beliefs, Values, and Ceremonies", it is stated that cremated remains were placed in an *olla*. This cremation is also mentioned in an archaeological survey report (September 2000) conducted by ASM Affiliates for South Bay Pump Station Final EIR (LDR No. 99-1024).

- Z-5 • No mention is made of the thousands of recorded archaeological sites in the City. The closest section comes to mentioning *any* of these sites is in the "Impacts" portion, for "the area in the vicinity of I-5 offramp at Garnet Avenue". It notes that "This area has a possibility of containing a portion of a suspected village site." Suspected village site? It is a recorded, well-known and well-documented site, La Rinconada, information on which is in the City's archaeology library. And what about other village sites, like Ystagua, Cosoy and Nipaguay?
- Z-6 • No mention is made of what, if any, archaeological sites other than La Rinconada, have been recorded in the vicinity of the various village centers proposed by the City of Villages Plan, or if those areas have ever been surveyed.

If the Prehistory section is wanting in sensitivity and information, the "History" section is at least as bad:

- Z-7 • Incredibly, the entire history of the City from 1769 to the present collapses into only four lines of text. Interestingly, those four lines are followed by the statement that "San Diego is a city that is rich with [sic] history."
- Z-8 • Historical archaeological sites fare no better than prehistoric ones. What about Mission San Diego de Alcalá, Rancho Peñasquitos, Old Town and the Presidio?
- Z-9 • Various communities are mentioned as having been surveyed for historical resources without mentioning which ones have not been surveyed or, of the ones that have been surveyed, which require resurvey due to the passage of time.
- Z-10 • Only one National Historic Landmark, in Balboa Park, is mentioned. All the other National Historic Landmarks and National Register properties are unmentioned, as are the thousands of properties that have been landmarked by the City. Indeed, even the *existence* of the City's Historical Resources Board is not mentioned.

Z-11 The first paragraph of the "Mitigation Measures" section is actually discussing impacts, not mitigation. Later in the mitigation section, the second bullet in the second set of bullets calls for "repairing damage to the historic structure" as mitigation for cases when "preservation of a significant historic structure on a development site" cannot be "completely implemented". Do the authors really propose repairing damage prior to demolition of the building?

- Z-12 The last two paragraphs, in a convoluted, grammatically-challenged way, say is that the growth strategy itself has significant impacts. Either of two situations must occur:
- (1) The growth strategy has no impacts and, therefore, no mitigation measures need be included, because all impacts will be addressed and mitigated at the project level, or
 - (2) The growth strategy has significant impacts and, therefore, specific mitigation measures must be presented.
- Which is it?

Z-13 Section X of the DEIR does not distinguish between the "EIR Preparers" and "Contacts". It is painfully obvious that, at least for Section I, too much reliance was placed on a group of interns, and that no effort was made to draw upon the City staff persons who have specialized expertise in historical resources. The only reasonable alternative is to replace

STAFF RESPONSE Z-5: The Environmental Analysis Section of the City's Development Services Department has 7.5 minute USGS quadrangle topographic maps with recorded archaeological sites. These maps were compared against the 4th draft City of Villages map to determine any potential significant impacts. The nebulosity of the cited Native American village location in the distributed DEIR was intentional; this was in keeping with the general policy of the City not to disclose the exact location and nature of archaeological sites in public documents such as this EIR such that these important resources remain intact and undisturbed by unauthorized collectors.

Regarding the commenter's other cited villages, the proposed strategy would not affect the Ystagua or Nipaguay. Any potential, indirect effect on Copsoy can not be determined at this time; however, any future development including any potential village implementing the proposed strategy which may occur on or near an intact or previously unstudied Native American village, would be required to survey the project site for the village extent and determine the significance of any remaining artifacts or subsurface features.

STAFF RESPONSE Z-6: Refer to previous Staff Response Z-5.

STAFF RESPONSE Z-7: It should be noted that while the history of San Diego is rich as described in the distributed DEIR and the prehistory is interesting, the purpose of this discussion is not a dissertation; it described the history and prehistory briefly but adequately and appropriately for the impact analysis for the proposed City of Villages strategy, a guide to future growth and development without any land use change or specific village locations. Consistent with CEQA Guidelines, this DEIR and specifically this analysis, focuses on the impact and potentially affected area of the proposed strategy.

STAFF RESPONSE Z-8: Refer to previous Staff Response Z-7. The proposed City of Villages strategy proposes no potential villages in the commenter's cited, significant historic areas.

STAFF RESPONSE Z-9: Comments noted; these comments do not address the adequacy of the distributed DEIR or its determinations. The cited community surveys would be considered when community plans are subsequently updated or amended to implement the proposed strategy. Refer to previous Staff Responses B-5 and Z-7.

STAFF RESPONSE Z-10: Comments noted; these comments do not address the adequacy of the distributed DEIR or its determinations. The description of existing conditions is tailored to the potentially impacted area. The commenter's use of the word "landmarked" is unclear; if the commenter means "surveyed", there are indeed the cited "thousands of properties" which have been surveyed. If the commenter means "listed" or "designated" by the City's Historical Resources Board (HRB), there are less than 500 listed/designated sites and structures. The HRB list of significant historical resources was used to determine the potential adverse effects of the proposed City of Villages strategy. Consideration was given to including the HRB list as an attachment to the distributed DEIR, but the list was not attached because it was determined that only four identified areas may be adversely affected.

STAFF RESPONSE Z-11: Comments noted; these comments do not address the adequacy of the distributed DEIR or its determinations.

STAFF RESPONSE Z-12: The commenter's first statement is partially correct; the distributed DEIR determined that the proposed strategy to guide future growth and development could indirectly pose a significant impact. It is unclear why the commenter's situations are posed; the distributed DEIR clearly disclosed the impact analysis of historical resources, the significance of the impact, and appropriate general mitigation measures. The distributed DEIR followed the City's standard procedure to disclose/describe mitigation measures only when significant impacts are determined to be posed by the project; this is a CEQA requirement.

STAFF RESPONSE Z-13: The commenter's interpretation of a list of persons in Chapter X approaches clairvoyance. The distributed DEIR analyzed impacts posed by the proposed City of Villages strategy, a guide to future growth and development without any land use change or specific village locations. Consistent with CEQA Guidelines, this DEIR analyzed impact on a solely policy level where impacts would not occur until the proposed strategy is implemented by subsequent plan amendments or updates. The generalized descriptions adequate for this DEIR did not require an archaeologist or a historian. Required, subsequent site-specific environmental review may require the expertise of a qualified historian and/or archaeologist to conduct site-specific surveys and prepare appropriate technical studies.

the entire Section I with a new one, prepared by or with the assistance of the latter persons.

Thank you for providing this document to us for our review and comment. We look forward to also reviewing its successor.

Sincerely,


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

cc: SDCAS President
File



Save Our Heritage Organisation

2476 San Diego Avenue • San Diego, CA 92110 • 619/297-9327

March 6, 2002

Lawrence C. Monserrate
Assistant Deputy Director
Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

CITY OF SAN DIEGO
MAR 13 2002
PLANNING DEPARTMENT

DEIR City of Villages Growth Strategy - Strategic Framework Element
LDR No. 40-1027

Dear Mr. Monserrate:

Aa-1 The comments below express SOHO's concerns about the City of Villages Growth Strategy and its impact on significant historical resources. Although we acknowledge that the strategy implementation will be phased, as will the assessment of potential environmental impacts, it is critical that the Growth Strategy document contain a baseline and context for those future studies. It does not contain those elements and is therefore not adequate.

Aa-2 First, the map included with the document is too small and lacks any locational detail. It is not possible to determine the limits of the project,

Aa-3 SOHO would like to point out first that the City of San Diego is already a City of Villages: Hillcrest, Talmadge, Rolando, Little Italy, etc. Any growth strategy must take community character and history into account to provide a context for redevelopment and growth. Our diverse neighborhoods are treasured by our citizens and must be preserved.

Areas of Significant Historic Resources (page IV-77)
Aa-4 The Strategy states that there are three areas with significant historic resources, one area with a "possible village site", and one area with potential historic value. This is incorrect. Over the past decades, the City of San Diego has sponsored and funded many surveys of the city which have identified in detail significant historic districts. The Strategy fails to mention any of these surveys, and does not state that they will be used as a context to form the villages. This is a gross oversight.

Aa-5 The three areas with significant historic resources cited in the Strategy are: the west side of 25th street, which is the Greater Golden Hill Historic District; east San Ysidro Boulevard, east of Interstate 805 (El Toreador Motel is mentioned); and the south side of

STAFF RESPONSE Aa-1: Additional information and analysis of historical resources will be conducted the subsequent Cultural and Historical Resources Element which will be undertaken subsequent to the approval of the proposed Strategic Framework Element.

STAFF RESPONSE Aa-2: Refer to previous Staff Response B-5.

STAFF RESPONSE Aa-3: The Core Values and policies of the Strategic Framework Element contain similar language as the commenter's existing village examples. Also refer to previous Staff Response B-15.

STAFF RESPONSE Aa-4: Refer to previous Staff Response Z-10.

STAFF RESPONSE Aa-5: Refer to previous Staff Response Z-7. The City of Villages strategy proposes no potential village sites in the commenter's cited historic resources/areas.

Crosby--Chicano Park. Are there only three locations within the strategy project area that have significant historic resources? Not the Mission? Presidio Park? Mission Hills? Other notable omissions include the historic portion of 6th Avenue, the community north of Crosby, and 30th Street in South Park. The absence of these nationally and locally significant historic areas is puzzling.

Aa-6 The Strategy mentions that San Ysidro west of Interstate 805--the Little Landers Colony--is "potentially historic". Again, the citation of this area as the only potentially historic area in the city is difficult to accept, given the great number of known historic resources in our city. In fact, the city's own Historic Resources Board has designated hundreds of locations significant to the history of San Diego. This advisory group is not even mentioned in the Strategy as a resource.

Aa-7 Another group omitted from the strategy is our Native American community. The continued misspelling of the name "Kumeyaay" throughout the document shows the document preparers' lack of familiarity or concern with this community. No Native American consultation is mentioned in the document.

Aa-8 The final historic area mentioned in the Strategy is Interstate 5 at Garnet; this is cited as a "possible village site". One assumes the document is referring to La Rinconada, a Late Prehistoric settlement of the Kumeyaay. There are many significant archaeological sites in the City of San Diego, including widely known sites within the strategy project area such as Cosoy. The documents consideration of archaeological sites is particularly skimpy and inadequate. Again, puzzling since the City has SANGIS information showing site locations within the city.

Context and Summary of Prehistory and History (page IV-75)

Aa-9 A complete understanding of San Diego's history and prehistory is necessary to place redevelopment and growth into context. However, the summary in the document is unacceptably brief and is full of general statements and errors. Looking at the list of references at the end of the document, none of the many excellent resources on San Diego prehistory and history were consulted. For example, as mentioned above, several nationally important Native American villages are within the study area. The city Historic Resources Board's list of designated structures and districts is not mentioned and must have been unknown to the preparers of the document. The gross omissions and errors in this section must be corrected.

Mitigation Measures (page IV-78)

Aa-10 The biggest section of the chapter on historical resources is on Mitigation Measures. The broad assumption seems to be that little will be preserved in place, and that any impacts can be easily mitigated through photography and conservation easements. This simplistic view is not adequate. The first measure cited is "Site development design to avoid significant resources". The plans should embrace significant resources. The historic communities and neighborhoods should be the context and setting for redevelopment. The use of conservation easements is ineffective. There is no way to ensure that the easements are protected, and no recourse for damage to the resources within them other

STAFF RESPONSE Aa-6: The distributed DEIR focused on known, significant resources which may indirectly be adversely effected by the subsequent implementation of the proposed strategy.

STAFF RESPONSE Aa-7: Refer to previous Staff Response Z-1.

STAFF RESPONSE Aa-8: Refer to previous Staff Response Z-5.

STAFF RESPONSE Aa-9: Refer to previous Staff Response Z-5.

STAFF RESPONSE Aa-10: These mitigation measures are standard measures in the City when dealing with historical resources; they are consistent with the Historical Resources Guidelines of the Land Development Code.

than by a lawsuit. Any protective easements should provide real conservation of resources through a monitoring program and superior design.

Conclusion

Aa-11

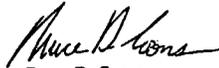
As stated in the beginning of this letter, we already have a City of Villages—historic communities and districts representing the diverse and unique qualities that led to the San Diego of today. The first step in this Strategy should have been to identify nodes of historic communities, and to look for opportunities to restore, enhance, and preserve these areas to reflect community character and pride. For example, why didn't the document use the existing City of San Diego historic resource surveys (or even mention them)? Avoid the cookie cutter approach to city planning, which will result in massive loss of our historic city and destroy our sense of belonging to a community.

Aa-12

A final point: Heritage Tourism is a growing business. Many tourists visit historic areas when they travel. The Strategy needs to consider Heritage Tourism and plan for visits to our historic districts and areas.

Thank you for the opportunity to provide these comments. We look forward to reviewing a revised document.

Sincerely,



Bruce D. Coons
Executive Director

STAFF RESPONSE Aa-11: Refer to previous Staff Response Z-5.

STAFF RESPONSE Aa-12: Comments noted.



**BUILDING INDUSTRY
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National Association
of Home Builders

National Association
of Industrial and
Office Properties

March 7, 2002

Mr. John Kovac
Senior Planner
Planning Department
City of San Diego
202 C Street, MS 5A
San Diego, CA 92101

Dear Mr. Kovac,

The Building Industry Association of San Diego County is comprised of 1,350 member companies with a workforce of more than 90,000 men and women in San Diego. We have reviewed the City of Villages Environmental Impact Report and offer the following comments and recommendations regarding the village plan.

First of all, the BIA would like to commend the city and staff for recognizing its obligation to thoughtfully plan for the city's forecasted growth for 2020 and beyond. However, the action plan does appear to call for the implementation of several new regulatory obligations that pose significant impediments to the stated goal of "increasing the overall supply of housing and facilitate the development of affordable housing through application of appropriate land development regulations and permit processing procedures."

Additional Regulatory Barriers

The creation of a New Community Identity Element and a Conservation Element run the risk of becoming duplicative regulatory requirements for environmental issues currently covered by the Environmentally Sensitive Lands Ordinance and the Multiple Species Conservation Program. The industry backed the MSCP with the understanding that hard-line areas identified for development would not be deterred by additional regulatory constraints. To require additional regulatory requirements in designated development areas will reduce the opportunity to provide much needed housing units. The city must respect the provisions set forth in the agreement.

STAFF RESPONSE Bb-1: Comments duly noted.

STAFF RESPONSE Bb-2: Comments noted. The initial intent regarding the cited new elements is to protect community open space and urban canyons.

Bb-2

Bb-1

Program Success Is Dependant Upon The Creation Of Multifamily Units

Bb-3

The EIR states that the proposed City of Villages would produce 17,000 to 37,000 attached homes by 2020 as the new growth policy is implemented. Furthermore, it is designed so that it would not result in the intensification or densification of existing zoned detached, single family neighborhoods. While the BIA supports the city's move to densification, the continuing impediments to multifamily housing creation jeopardizes the City of Villages concept and Smart Growth in general. Unless there are substantive reforms in construction dispute litigation coupled with legislative efforts to revitalize insurance availability, the ability to create an adequate number of multifamily units necessary for the program's success remains doubtful. The city must aggressively participate in state legislative efforts to reform construction dispute litigation and revitalize the multifamily housing market.

STAFF RESPONSE Bb-3: Comments duly noted. The existing barriers which prevent the development of affordable, mixed use attached, for-sale units are recognized.

STAFF RESPONSE Bb-4: Comments duly noted.

Establish A Broad Base Funding Source To Address City Needs

Bb-4

The City of Villages concept requires the city to engage in a comprehensive financial approach to address a myriad of needs including infrastructure, transportation, essential public services, affordable housing, open space and stormwater. Twenty-five years of deferred maintenance has resulted in a funding backlog of between \$2.1 billion to \$2.9 billion. No matter how you look at it, the city must pursue a broad base funding source in order to responsibly address both the deferred maintenance and the need for vital new infrastructure. The BIA is prepared to assist in the effort to identify, support and promote a broad based funding package that will provide the necessary resources.

STAFF RESPONSE Bb-5: Comments noted. It should be noted that the six percent reported in the distributed DEIR has been revised to 10% of total trips in the year 2020. These trips would be attributable to transit ridership, walking, and bicycling. During the subsequent proposed strategy implementation through community plan updates or amendments, community level transportation needs including the roadway system would be evaluated along with transit improvements. It should be noted that the proposed City of Villages strategy would not change the Circulation Element, all planned roads in the current community plans were included in the analysis.

STAFF RESPONSE Bb-6: Comments noted. The City is currently working on ways to streamline permit processing for affordable housing; this would be applicable to the attached mixed use units envisioned by the proposed City of Villages strategy. In addition, other incentives for the desired affordable housing are expressed goals of the proposed 5-Year Action Plan.

Establish Realistic Transportation Goals

Bb-5

The city must establish realistic goals to accommodate the estimated 180,000 to 240,000 additional trips generated by the plan. Traffic modeling indicates a 6 percent reduction in travel trips attributed to transit use and walking. While an improved transit system is an important component, equal attention and resources must be given to the completion of local streets and roads. All available data suggest that more than 90% of commuters are not prepared to give up their automobiles. The incomplete arterial network prevents the use of a viable alternative to freeway driving for short trips. Completion of the arterial network must be accelerated.

Streamline The Regulatory Process

Bb-6

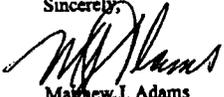
Development costs are influenced by a variety of factors, but none is more acute than a protracted regulatory process. The move toward the City of Villages plan will lead to additional construction costs associated with infill and redevelopment. The city must engage in a comprehensive restructure of the planning process concurrent to the implementation of the Strategic Framework Plan that results in a streamlined and time certain regulatory process.

2:52 2:51PM

NO. 4258 P. 4

The BIA appreciates the City's leadership in advancing the principles of smart growth. We look forward to working with the city on a realistic and comprehensive program that provides the appropriate mechanisms to plan and implement a vision that meets the needs of our expanding population.

Sincerely,



Matthew J. Adams
Director of Governmental Affairs

sw:mja

cc: Gail Goldberg
Colleen Clementson



BUSINESS IMPROVEMENT DISTRICT COUNCIL
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CITY OF SAN DIEGO
MAR 26 2002
PLANNING DEPARTMENT

March 25, 2002

Mr. John Kovac

Land Development Review Division Development Services Center
1222 First Avenue, Mail Station 501
San Diego, CA 92101

RE: Draft Environmental Impact Report
City of Villages Growth Strategy-Strategic Framework Elements

Dear Mr. Kovac,

Cc-1

The City of Villages Strategy, the five-year action plan and the DEIR required for the General Plan update, signify a positive shift in land use policy. Relying on the adoption of 'smart growth' concepts, which will concentrate San Diego's future growth in its urban core, by reinvesting in existing communities and neighborhoods and avoiding the further development of open land and the pattern of urban sprawl, will be beneficial to the small business community.

Cc-2

The strategy calls for the intensification of development in mixed-use village centers and along transit corridors, with the addition of new mass transit products and options. The plan also identifies and attempts to correct problems associated with past urban infill practices by focusing on the components necessary for the formation of sustainable walkable communities including appropriate design, required public infrastructure additions and community partnerships. The framework calls for new, varied and affordable housing products in close proximity to retail activity employment centers, which will provide new market opportunities for San Diego's small business community.

Cc-3

The BID Council, however, has concerns about the lack of identifiable funding sources for infrastructure, housing and transit proposals in this plan and notes that implementation strategies are not yet fully developed. Serious potential negative impacts to San Diego's older communities will result if planned increases in residential density precede the installation of necessary public amenities. These communities currently suffer from infrastructure

STAFF RESPONSE Cc-1: Comments duly noted.

STAFF RESPONSE Cc-2: Comments duly noted.

STAFF RESPONSE Cc-3: As part of the City of Villages planning effort, a draft financial consultant report entitled, "City of San Diego, Facilities Financing Report" (April 2002), has been prepared. This study outlines the possible funding mechanism to provide needed facilities.

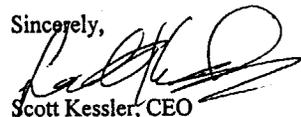
A framework for providing the needed facilities will occur through an update of the Public Facilities Element of the General Plan and preparation of expanded Communities Facilities elements in community plans. The Public Facilities Element will set forth a strategy for prioritizing public facilities needs on a citywide basis while Community Facilities elements will provide a mechanism to prioritize the provision of facilities and provide policy guidance for the development of Community Facilities Financing plans.

deficits combined with the highest residential density in the City. Without the implementation of new transit products the proposed residential increases will overburden the arterial highway/street systems. The City's inability to provide sufficient urban open space for current density will be further exacerbated with the addition of new residential units. Where will the funds to develop proposed infrastructure improvements come from when funding to correct existing infrastructure deficiencies has yet to be identified?

Additionally, the BID Council urges the formation of specific parameters to guide City/community partnerships and respectfully suggests that in addition to the three pilot projects, a moderate ancillary program be implemented simultaneously for the remaining locations identified as existing or future villages. A nonprofit infrastructure framework already exists throughout the City and within the sited village locations. Business Improvement Districts, Maintenance Assessment Districts and Community/Economic Development Corporations are examples of community-based nonprofit corporations that are identified in the action plan as partners in the City of Villages implementation. We need to define these partnerships as they relate to implementation strategies. These community-based nonprofit organizations are uniquely positioned to partner with government in a collaborative effort on projects that require participation of nonprofit forces with their constituent base of property and business owner stakeholders in the implementation of the City of Villages.

The BID Council looks forward to collaborating with the City and fostering new partnerships to bring this plan to fruition.

Sincerely,



Scott Kessler, CEO
San Diego BID Council

SK:db

STAFF RESPONSE Cc-4: Comments duly noted. It should be noted that besides the initial three pilot villages project, it is estimated that three to five community plans would be updated each year to implement the proposed City of Villages strategy. The commenter's suggestions on partnership is appreciated. The successful implementation of the City of Villages strategy hinges on the successful synergy of the cited community partnership, City's land use jurisdiction and permit processing, MTDB's Transit First improvements, and community participation. The linchpin to the realization of the new vision for growth and future urban form remains the funding of currently needed and future facilities and services; funding is recognized as a major hurdle towards the future development of compact, mixed uses villages with enhanced amenities and walkability and interconnected by a world class transit system.

Cc-4



**SAN DIEGO
REGIONAL
CHAMBER OF
COMMERCE**

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March 14, 2002

Mr. John Kovac
Land Development Review Division
Development Services Center
1222 First Avenue, Mail Station 501
San Diego, CA 92101

CITY OF SAN DIEGO
MAR 26 2002
PLANNING DEPARTMENT

Re: Draft Environmental Impact Report
City of Villages Growth Strategy – Strategic Framework Element

Dear Mr. Kovac:

Dd-1

The San Diego Regional Chamber of Commerce has reviewed the above-referenced Draft Environmental Impact Report ("DEIR") and believes that the DEIR adequately complies with the requirements of the California Environmental Quality Act. The DEIR concludes that certain impacts, such as traffic, will be unmitigated. The Chamber notes, however, that these impacts result from the inevitable growth of the City over the next decades, regardless of whether the City of Villages is implemented. In particular, the No Project alternative would exacerbate the housing shortage and make it even more difficult to reduce housing prices to affordable levels. The Chamber believes that the City of Villages project, if properly financed, is the organized, manageable and realistic method of dealing with the City's future growth and the impacts which will result from such growth.

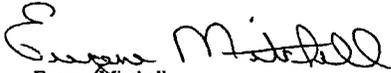
Dd-2

The Chamber is concerned that certain aspects of the project will increase the regulatory and processing burden and counteract attempts to increase housing affordability. Specifically, we oppose (1) new land use design guidelines, (2) a new Community Identity Element for planning areas to protect the natural form of individual communities, (3) amending the Environmentally Sensitive Land Regulations by revising criteria for ridgeline, hillside and riparian resource protection and (4) adoption of a Conservation Element.

Dd-3

The Chamber also continues to have concerns about the sources of funding for the infrastructure and transit requirements that are a vital part of the City of Villages project. Nevertheless, we look forward to working with the City to find an adequate and acceptable funding strategy.

Sincerely,


Eugene Mitchell
Vice President, Public Policy

STAFF RESPONSE Dd-1: Comments duly noted.

STAFF RESPONSE Dd-2: Comments noted. The City is currently working on ways to streamline the permit processing for affordable housing; this would be applicable to the attached mixed use units envisioned by the proposed City of Villages strategy. In addition, other incentives for the desired affordable housing are expressed goals of the proposed 5-Year Action Plan.

STAFF RESPONSE Dd-3: Comments noted. Refer to previous Staff Response B-34.



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CITY OF SAN DIEGO
 MAR 26 2002
 PLANNING DEPARTMENT

March 22, 2002.

Attn: Anne Lowri, Senior Planner

Subject: Comments on the Draft Environmental Impact Report (LDR DEIR No. 40-1027)

Dear Ms. Lowri,

Our primary concern is that issues related to low-income working families should not be brushed aside, and there should be sincere implementation of measures that mitigate the impacts caused by new development.

We are particularly concerned that publicly subsidized commercial development will be brought in, with no standards attached for job quality, and affordable housing impacts.

1) **Land Use:** This section does not adequately address the land-use changes being proposed and how they will improve on the current situation. Particularly, it lacks the following:

- Ee-1 | (i) Existing land-use conflicts such as toxic industries located in some residential areas of the city (e.g. Barrio Logan);
- Ee-2 | (ii) Summary of the inventory of developable land, both residential and employment land; estimation of job-creation;
- Ee-3 | (iii) Land-use items in the Action Plan such as Economic Prosperity Element, which call for expanding infill industrial sites with jobs that give decent wages. Since structural reform is proposed for future developments, there should be guidelines for new development (particularly commercial infill sites) to adhere to job quality standards.

2) **Cumulative Effects:** The document should address the following:

- Ee-4 | (i) Job-creation and economic development impacts on growth: there will be about 100,000 workers added to the city's workforce in twenty years. Where they work, and how much they are paid will impact their housing decisions, transportation choice, and quality of life. It is imperative that the plan should therefore incorporate guiding principles for new employment areas;
- Ee-5 | (ii) Impact of new development in downtown San Diego (particularly the Ballpark);
- Ee-6 | (iii) Induced impact of "villages" on surrounding areas;
- Ee-7 | (iv) Demolition of existing affordable housing stock due to "smart growth".

STAFF RESPONSE Ee-1: Recommendations to remedy existing land use conflicts are in the Action Plan (Action 7).

STAFF RESPONSE Ee-2: Refer to Staff Response D-5.

STAFF RESPONSE Ee-3: Refer to Staff Response B-10.

STAFF RESPONSE Ee-4: Refer to Staff Response A-7.

STAFF RESPONSE Ee-5: This issue will be addressed at the community plan and project level.

STAFF RESPONSE Ee-6: Refer to Staff Response B-5.

STAFF RESPONSE Ee-7: This type of detail will be looked into at the project level with consideration of affordable housing and equitable development policies.

Ee-8 3) **Transportation:** In Section IV.B there is evidence of a significant unmitigated impact of increased traffic. Although this impact is caused by population increase overall, it is worsened by the creation of pockets of densification that will lead to creation of bottlenecks (as in Table B-3) particularly on SR-94.

Ee-9 The document acknowledges that MTDB's TransitFirst Program could alleviate some of the traffic impacts, but does not give substantial evidence to prove that the impact of increased transit-ridership will be insignificant. It is not clear if the "City of Villages" option in Table B-4 includes the TransitFirst program. If it does, then it is not clear why there were no other transit options considered. This is especially critical because (a) the physical concentration of housing around transit-nodes and the creation of "transit corridors" (III-4) makes it the appropriate transportation mode; (b) Transit-Oriented Development guidelines are being adopted for proposed development (III-2); and (c) 89% of the local population consists of potential transit riders (I-3). In fact, the transit factor has been used to argue for the superiority of the City of Villages scheme over other alternatives (see VIII-3, VIII-5).

Ee-10 Therefore, if MTDB's TransitFirst Program does not reduce the transportation impact of densified urban centers, then other transit options should be considered, and weighed alongside in Table B-4. The "Transit-Oriented" scheme does not make sense if it does not lead to increased transit-ridership, and subsequently decreased VMT projections.

Ee-11 4) **Housing:** The document acknowledges that "for lower income households, affordable housing is generally unavailable" (I-9). Besides the economic hardship of the people effected, it also leads to overcrowding, families doubling-up, substandard housing, and extreme overburdening of the City's resources that leads to a decreased quality of life.

Ee-12 Although the City of Villages plan mentions the densities proposed for various sites, it does not mention the distribution of the total number of new Dwelling Units in each "village". For the City of San Diego, the plan mentions 17,000 to 37,000 additional units, but does not mention the total number of new dwelling units that will be created by 2020. In this situation it is difficult to assess the nature of residential construction that is proposed, and its impact on current construction trends (i.e. higher rates of SFU construction).

Ee-13 There is substantial empirical evidence from around the country that proves that "smart growth" planning reforms exacerbate housing affordability issues. For example:
(i) Stanley and Gilroy (2001) show that state growth-management acts may account for 26% of the increase in housing costs in Washington State and 20% in Florida¹;

¹ Staley, Sam, Gilroy, Leonard C. "Smart Growth and Housing Affordability" Los Angeles, CA : Reason Public Policy Institute, 2001.

STAFF RESPONSE Ee-8: Refer to Staff Responses B-33 and D-10.

STAFF RESPONSE Ee-9: Refer to Staff Responses A-10, B-20, and B-80.

STAFF RESPONSE Ee-10: Refer to Staff Response A-10.

STAFF RESPONSE Ee-11: This is addressed in the Action Plan (Goal 6).

STAFF RESPONSE Ee-12: Refer to Staff Response B-16.

STAFF RESPONSE Ee-13: This is addressed in the Action Plan Goal 6 "to increase housing affordability" and Goal 8 "to promote equitable development."

- (ii) Portland (Oregon), which has been a poster-child for Calthorpe Associates (consultants who prepared the TOD Guidelines approved by the City of San Diego on August 4, 1992), is one of the most expensive places to live in the country.
- (iii) A study by the Urban Land Institute argues that smart growth policies need to go hand-in-hand with affordable housing in order to have sufficient workforce housing².

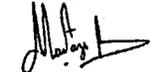
Ee-14 | Although the plan mentions some measures such as inclusionary housing regulation and the use of TOT funds for affordable housing (III-9), there is no specific proposal/timeline for implementation of these measures. Further, there is no mention of the projected number of affordable units that will be created as a result of these measures. If even a third of the 17,000 additional units are to be affordable to the low-income population, drastic measures will be needed to keep the prices affordable, given the grim scenario that rents are rising at twice the rate of general inflation (I-9).

Ee-15 | The plan also does not mention the proposed jobs-housing ratio for the new development.

Ee-16 | Although CEQA does not require socioeconomic analysis, the increase in unaffordability associated with "village designs" will have physical impacts on the environment related to increased traffic (as the lower-income population will be forced to move out), demand on public services and utilities (due to overcrowding), and related effects on air quality. The effects of overcrowding are most severe on schools and parking. Therefore, the subject of Housing deserves a separate section, which would demonstrate how the City of Villages scheme addresses the needs of various income groups.

We strongly urge you to have inbuilt check-and-balances that will ensure that future growth is amenable for all income-groups living in the City.

Sincerely,



Murtaza Baxamusa
Center on Policy Initiatives

STAFF RESPONSE Ee-14: Implementation strategies are outlined in the City's adopted General Plan Housing Element and under the Action Plan Goal 6: "Increase Housing Affordability."

STAFF RESPONSE Ee-15: Refer to Staff Response D-5.

STAFF RESPONSE Ee-16: An update to the Housing Element of the General Plan has been adopted by City Council. Also refer to staff responses B-9 and B-10.

² McIlwain, J., "Housing Affordability: Can smart growth principles help to provide for sufficient affordable workforce housing in urban areas?" *Urban land*, 61, Part 1 (2002): 46-49.

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CITY OF SAN DIEGO
MAR 26 2002
PLANNING DEPARTMENT

March 20, 2002

VIA US MAIL

Ms. Anne Lowry
Senior Planner
City Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

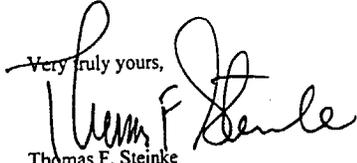
RE: City of Villages Draft Environmental Impact Report
Our File No.: 4352.46858

Dear Ms. Lowry:

I have reviewed the draft Environmental Impact Report (LDR DEIR No. 40-1027) for the City of Villages Growth Strategy/Strategic Framework Element (COV/SFE).

Ff-1 I would appreciate being noticed of all continued meetings and correspondence relating to the above referenced project. Please direct all related correspondence and updates to the plan to my attention at the address shown above.

Very truly yours,


Thomas F. Steinke
Seltzer Caplan McMahon Vitek
A Law Corporation

TFS/hjc
O:\M\4352\46858\CORRES\et Lowry re City of Villages EIR (827).doc

STAFF RESPONSE FF-1: Comments duly noted. All persons submitting written comments to the distributed DEIR will receive a copy of the Final EIR.

P. 1 of 24 Affn: Lawrence Monserate



RIVER VALLEY PRESERVATION PROJECT

• Working to preserve our Wetlands, Floodplains, and Greenbelt areas •

"A CITY OF VILLAGES": DEIR COMMENTS OF RIVER VALLEY PRESERVATION PROJECT

Gg-1 Page IV-97 incorrectly states "detached" homes instead of "attached" homes proposed with COV.

Gg-2 According to Friends of San Diego scoping letter (Appendix of DEIR), community plans already authorize 1.53 million residents-- more than enough to accommodate a 20% population growth in San Diego (this projected growth is highly dubious and will be discussed later).

Gg-3 What exact percentage of developable land in city remains vacant? (P. IV-1 states "less than 10%.")

RECREATIONAL IMPACTS AND MITIGATION NOT ADEQUATE

Gg-4 Page IV-97 states: "The current guideline of 20 acres open space per thousand people is difficult to attain for the higher, density, attached homes envisioned by the proposed growth strategy." How much park and open space is currently in city of San Diego? At 20 acres open space/thousand people, does this mean there should be 24,000 acres of parks/open space (presuming 1.2 million residents)?

Gg-5 The proposed mitigation states: "Either provide more activities or facilities on existing parkland as the current element allows or find alternative sites for enhancement/improvement such as urban canyons with planted riparian trees and plants and trail system to access the canyon. Either would mitigate potential significant effects to below a level of significance." This "mitigation" plans for A CITY OF VILLAGE SARDINES! This is not mitigation but rationalizing away of the increased need for open space based on added number of residents--as the current Plan Guidelines specify. This sounds like an excuse of the developer industry to cram more people into less acreage without adequate mitigation.

WHO IS ON THE CITIZEN'S ADVISORY COMMITTEE FOR COV?

Gg-6 "Enclosed" (pp. 2,3) is the list of each member of the Citizen's Advisory Committee for COV. Please reprint this list in FEIR, along with their occupation and whether, through their occupation or land ownership, they would likely benefit financially from the COV Plan being implemented (developer, contractor, construction industry, landowner of property on COV maps, real estate broker, banker, environmental consultant, insurance agent). This is vital information both for the public and decision makers. For example, in 1985, the Mission Valley Community Plan (MVCP) was passed by City Council. Instigators of the MVCP were mostly

STAFF RESPONSE Gg-1: Comment noted. This typographical error has been corrected throughout the text of the Final EIR. The proposed Strategic Framework Element/City of Villages strategy is expected to result in mixed uses where all residential uses would be attached homes.

STAFF RESPONSE Gg-2: The objective of the proposed Strategic Framework Element effort is to increase density in urbanized areas beyond that currently approved in existing community plans to accommodate projected growth. As discussed in Goals and Objectives section of the distributed DEIR, estimates completed by SANDAG conclude that by the year 2020, the City would add to its currently to its population of nearly 1.3 million, an additional 380,000 persons. Based on reasonable housing yield anticipated by existing community plans and zoning would fall approximately 17,000 dwelling units short of accommodating the projected additional 380,000 people. To accommodate the population increase, the City is proposing through the Strategic Framework Element, to develop approximately 17,000 to 37,000 residential units beyond that currently approved by existing community plans.

STAFF RESPONSE Gg-3: The percentage of developable land within the City as disclosed in the distributed DEIR is approximately 10%. The percentage figure is based on review of community plans.

STAFF RESPONSE Gg-4: The total acreage of parkland within the City is 34,260 acres.

As discussed in the distributed DEIR, the General Plan contains flexibility to provide adequate recreational opportunities. As a result, the use of 20 acres of open space per 1,000 persons rate is considered a guideline. A more refined 1.5 to 2.8 acres per 1000 persons (attached units) of active park is disclosed in the Final EIR.

STAFF RESPONSE Gg-5: The Recreation Element of the current Progress Guide and General Plan explains that the requirements regarding provision of park acreage are guidelines and not fixed needs and where parkland is difficult to acquire, effort to provide park staff and facilities should be directed to compensate for deficiencies in acreage of parkland. In general, many of the potential areas identified for potential higher densities in accordance with the proposed Strategic Framework Element are proposed in the more urbanized areas in the central portion of the City. Therefore, as discussed in the distributed DEIR options to provide park amenities would be to either improve facilities at existing parks in urban areas or provide for passive recreation within the existing canyons located in the more urbanized portions of the City. The possibility of acquiring new parkland has been added to the Final EIR.

STAFF RESPONSE Gg-6: This comment letter in its entirety and the commenter's attached list of citizen committee members are included in the Final EIR.

To add information on commenter's asserted likely financial benefits to each individual from implementation of the project would be speculative and would not address the adequacy of the distributed DEIR. Section 151204 of the CEQA guidelines states that the focus of comments from the public on a CEQA document should be limited to the adequacy of the CEQA document in identifying and analyzing the possible impacts of a project on the environment and the ways in which the significant impacts of the project might be avoided or mitigated. In addition, CEQA Section 15131 states that socioeconomic effects are not to be treated as significant impacts to the environment. Therefore in accordance with CEQA Guidelines Section 15204 and 15131 edits to the list requested in this comment are not included in the FEIR.

Janet Anderson, Sierra Club
 Risa Baron, San Diego Gas & Electric
 Michael Beck, Endangered Habitats League
 Nancy A. Burkhart, Public Relations/Government Affairs Consultant
 Tom Carter, Carter, Reese & Associates
 Kurt Chilcott, CDC Small Business Finance Corporation
 Donald Cohen, Center for Policy Initiatives
 Gloria Cooper, San Diego Organizing Project
 Dennis Cruzan, Burnham and Company
 Joyce Cutler-Shaw, Artist
 Marc Doss, Bank of America
 Steve Estrada, Estrada Land Planning
 Beth Fischer, Pardee Homes
 David Flores, Casa Familiar, Inc.
 Jan Fuchs, Community Planners Committee
 Mike Galasso, Barone Galasso & Associates, Inc.
 Larry Herzog, San Diego State University
 Nancy J. Hughes, Consensus Organizing Institute
 Robert Horsman, San Diego National Bank
 Bruce Husson, Burnham and Company
 Margaret Iwanaga-Penrose Union of Pan Asian Communities
 Richard Juarez, Urban-West Development Consultants
 Matthew Jumper, San Diego Interfaith Housing Corporation
 Diane Keyes, Neighborhood National Bank
 Michael LaBarre, Fehlman, LaBarre Architects
 Anna Mathews, Human Relations Commission
 Robert McGill, Neighborhood National Bank
 Julie Meier Wright, San Diego Regional Economic Development Corporation
 Vera Moldt, V. M. Consultants
 Michelle Mueller, San Diego Gas & Electric
 Kotaro Nakamura, Roesling Nakamura Architects, Inc.
 Charles Nathanson, San Diego Dialogue
 Alan Nevin, Market Point Realty Advisors
 Doug Paul, Project-Design Consultants
 David Potter, Community Planners Committee Chair

* This is a list of the individuals who served on the Citizen Committee. Affiliations are included for identification purposes only.

Guy Preuss, Community Planners Committee
 Mark Reidy, University of San Diego
 Reint Reinders, San Diego Convention and Visitors Bureau
 Jerry Sanders, United Way of San Diego County
 Steve Silverman, Rick Engineering
 Reginald Sledge, Mayor's Environmental Advisory Board
 Lou Smith, San Diego City Schools
 Andy Spurlock, Spurlock Poirier Landscape Architects
 Tom Sullivan, Burnham Real Estate Services
 Anthony Tri Tran, State Farm Insurance
 Gerald Trimble, Keyser Marston and Associates
 Revrend Mark Trotter, First United Methodist Church
 Evelyn Warner, HMC Group
 Gary Weber, GR Weber
 Joe Wolf, San Diego City Schools
 Tina Zenzola, California Center for Childhood Injury Prevention, SDSU

Carmel Mountain Ranch Community Council, Leanne Howard Kenney, Chair
 Carmel Valley Community Planning Board, Joan Tukey, Chair
 City Heights Area Planning Committee, Jim Varnadore, Chair
 Clairemont Meta Planning Committee, David Potter, Chair
 College Area Community, Sandra Buchner, Chair
 Del Mar Mesa Community Planning Board, Jan Hudson, Chair
 Eastern Area Planning Committee, Jim Leighton, Chair
 Encanto Neighborhoods Community Planning Group, Deryll Williams, Chair
 Greater North Park Planning Committee, Chris Milnes, Chair
 Greater Golden Hill Planning Committee, Cindy Ireland, Chair
 Kearny Mesa Community Planning Group, Buzz Gibbs, Chair
 Kensington-Talmadge Planning Committee, Jonathan Tibbitts, Chair
 La Jolla Community Planning Association, Claude-Anthony Marengo, Chair
 Linda Vista Community Planning Committee, Ed Cramer, Chair
 Midway Community Planning Advisory Committee, Leslie Hokr, Chair
 Mira Mesa Community Planning Group, Ted Brengel, Chair
 Miramar Ranch North Planning Committee, Peggy Shirey, Chair
 Mission Beach Precise Planning Board, Alan Murray, Chair

P. 4

landowners who stood to gain hundreds of million of dollars to have their floodplain property upzoned--as the Mission Valley Plan did. It appears that a similar thing is occurring with COV (even if COV is not technically an upzone--in effect that is what this will allow).

Gg-7 What is the current allowable limit on dwelling units/acre under the General Plan? If COV is approved, how much would land values increase at the proposed COV sites mentioned in the DEIR (presuming community plans are updated to allow the density increases)? Please present a table with upzoned land value increases compared with the current General Plan allowable densities as "baseline." Without this vital information, the public and elected officials cannot make a rational decision on COV. Also, please include in this table, the names of landowners who would benefit from the eventual upzoning, locations of their properties, and their connection (if any) to promoting COV. This is vital to know both for the public and decision makers.

TRANSIT FIRST?

Gg-8 If Transit First were not funded, how many more ADTs and air pollution would be added to the amounts quoted in DEIR?

Gg-9 About how much redevelopment money would be used for COV? Redevelopment money is all taxpayer funded--correct?

Gg-10 Why isn't there an alternative that would fund Transit First from the increase in property values that would result from the increased densities allowed by it? Since landowners would probably reap hundreds of millions or billions in increased property values from COV, the least they could do is fund the Transit improvements that would be required as part of this "vision." Without such an alternative, this DEIR is fatally flawed for at least two reasons. One, Transit First without money is nothing but a pipe dream. Second, if developers and landowners would become super rich from this, there must be a General Plan update option that would require them to pay for transit improvements for at least a "bandaid" mitigation to the severe impacts they would impose on all San Diegan's quality of life (huge increases in traffic and air pollution).

Gg-11 Why isn't there a COV option without density increases? I am familiar with mixed use areas and recognize conveniences of having food, shopping and transit within walking distance. Such residential areas are livable BECAUSE the density is not that high--perhaps 20 units/acre and low density shops. COV density of 145 dwelling units/acre would be unlivable for many. Without such a "current density option," the EIR is legally inadequate; and appears to confirm the notion that COV is a huge land "giveaway" (increased property values) for a relatively few landowners--at the expense of the rest of us.

STAFF RESPONSE Gg-7: Comment noted. Refer to previous Staff Response Gg-6.

STAFF RESPONSE Gg-8: The information on property values requested in this comment is not required for an adequate EIR. Providing information on the effects of implementation of the project on property values would be speculative and would not address the adequacy of the CEQA document in accordance with CEQA Guidelines Section 15204 and 15131. Refer to previous Staff Response Gg-6 for additional information on requirements for public review comments and consideration of socioeconomic effects in an EIR.

STAFF RESPONSE Gg-9: The information requested by the commenter was not obtained for the preparation of the DEIR for the proposed Strategic Framework Element. As discussed in the Scope of the DEIR, the analysis completed for the DEIR addressed the addition of 17,000 to 37,000 residential units beyond that anticipated by the existing community plans. The analysis of impacts to air quality contained in the distributed DEIR is based on the proposed number of units and, therefore, does not address potential impacts associated with not implementing MTDB's Transit First plan.

STAFF RESPONSE Gg-10: The information on redevelopment funding requested in this comment is not included in the FEIR. Providing information on the effects of implementation of the project on redevelopment funding sources would be speculative and would not address the sufficiency of the CEQA document in accordance with CEQA Guidelines Section 15204 and 15131. Refer to previous Staff Response Gg-6 for additional information on requirements for public review comments and consideration of socioeconomic effects in an EIR.

STAFF RESPONSE Gg-11: Speculation on funding Transit First through increased property values requested in this comment was not required by CEQA included in the DEIR. Providing information on the effects of implementation of the project on increased property values would be speculative and does not address the adequacy of the CEQA document in accordance with CEQA Guidelines Section 15204 and 15131. Refer to previous Staff Response Gg-6 for additional information on requirements for public review comments and consideration of socioeconomic effects in an EIR.

P. 5

HISORICAL BACKGROUND OF TRANSIT FIRST: SHOULD WE TRUST MTDB WITH A VISION OF SAN DIEGO'S FUTURE?

This Transit First/COV "vision" presumes that the Prop. A road and transit sales tax will be extended by the voters and that a "world class" transit system is funded. In 1987 when Prop. A was passed it barely won a majority--receiving less than 52% of the vote. This tax now requires 2/3 of the vote to pass. Despite taxpayer funded SANDAG focus groups to sell this tax, it is highly dubious that Prop. A could be extended by a 2/3 majority. If the public knew the deceitful background of the first Prop. A, it is highly likely it never would have been passed.

Many people will not support extending Prop. A because of the belief that new developments should pay for these road and transit improvements rather than taxpayers. The current Prop. A sales tax has massively subsidized planned developments in Mission Valley. For example, MTDB paid the Levi-Cushman owners of the Stardust (Riverwalk) Golf Course over \$10 million for trolley right of way and rebuilding of the golf course. Too, the owners of the course had some of the required flood control done with taxpayer money--flood control they would have had to pay for themselves. 250,000 cubic yards was illegally added to the golf course reconstruction after the trolley came through (making it much easier to develop it), again at public expense. Plus, the trolley's proximity increased the value of the land by millions of dollars--at taxpayer expense. This took place even though MTDB's own documents showed a Friars Road option would have been \$20 million dollars cheaper! When this was brought to the attention of the Army Corps of Engineers as part of their decision whether to grant a 404 wetlands intrusion Permit, MTDB simply revised their consultant's unbiased cost estimates and made the Friars Road option "more expensive!" MTDB was also caught misrepresenting operational costs of the EIR analyzed Bus Option. When this was brought to the attention of the Army Corps, MTDB had to admit their LRT and Bus option operating costs were off by millions of dollars/year! In truth, the Bus option operating costs were cheaper by about a million dollars/year. MTDB had been selling this trolley to the public as far cheaper to operate than the Bus Option--based on false and misleading figures.

Many people have said they would not have voted for Prop. A if they knew the truth about the costs of various trolley extensions, the low ridership, and the planned path of the West Mission Valley Trolley (WV LRT) and East Mission Valley LRT (EMV LRT) through the floodway, and River Valley and Stardust Golf courses. Voters had no idea this would enrich private landowners (Fenton just west of stadium development, Levi-Cushman plan to subdivide the Stardust ("Riverwalk") Golf Course, Hazard Center, Rio Vista West) who would receive "density bonuses" (the right to build more units/acre) for being within 1/4 mile of the trolley.

STAFF RESPONSE Gg-12: An objective of the proposed Strategic Framework effort is to increase density in urbanized areas beyond that currently approved in existing community plans. Refer to previous Staff Response Gg-2 for additional information on regional population projects and housing supply shortage to be addressed by the proposed project. As discussed in the DEIR, coupled with the increased demand for housing created by economic growth is the reduction of supply through current land use designations. The trend in San Diego of not developing at the maximum density allowed, or rezoning to lower densities to allow more detached homes has reduced the potential housing stock in the City. San Diego's demographics suggest a need for attached housing with units of more than two bedrooms to accommodate lower income renters as well as first time homebuyers. Recent residential development is geared towards upper-end single family residential in the north city area and multifamily units downtown.

Gg-12

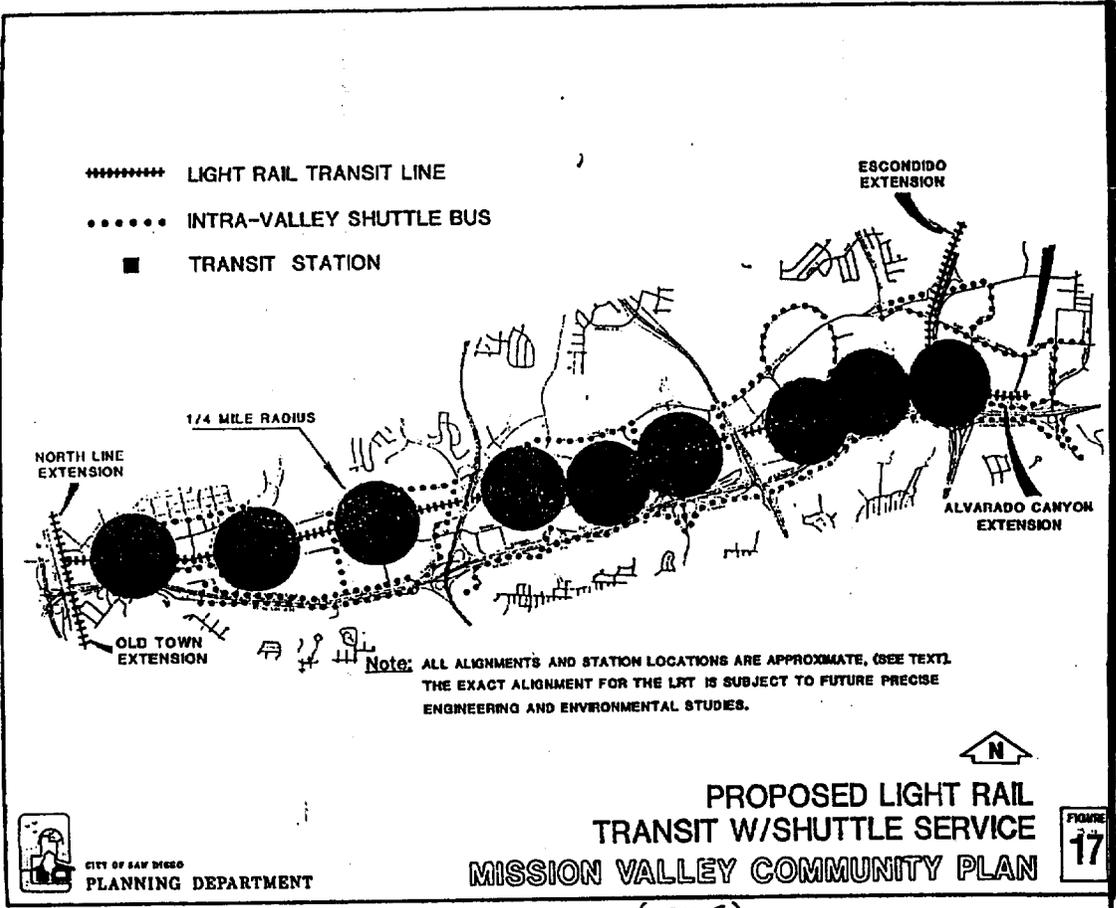
P. 6

The Prop. A Ballot (p. 7 of these comments) didn't mention that the trolley would run through the floodway/floodplain even though this route was shown in the Mission Valley Community Plan (MVCP) two years prior in 1985 (p. 8 of these comments). Please note the difference between the 1985 MVCP map and the one presented to voters as the one voters saw had the trolley quite close to I-8 rather than through the middle of the floodplain as disclosed in the MVCP (and as built). Many people have been utterly disgusted when learning of this (and other routes) impacts, low ridership and true costs. For example, the EIRs for the WMV LRT and the EMV LRT candidly admitted that they would have no perceptible effect on traffic congestion or air pollution. Yet Prop. A was submitted to the voters for the purpose of "reducing congestion and air pollution." Time and again, SANDAG and MTDB members repeated this mantra to sell these trolleys--"traffic relief and clean air" when the truth was a tiny, not perceptible effect. When this was made clear at a SANDAG meeting in 1995, Supervisor Pam Slater (who was there as a private citizen), was moved to make an impromptu speech to SANDAG. She stated that it was ludicrous to be spending so much money for so little ridership (16,000/day projected in EIR; line currently getting about 5,000 riders/day). She also stated "Someone has to say it. The Emperor has no clothes. We need money for projects that make sense. This one does not." This was quoted in the Union-Tribune.

Gg-12

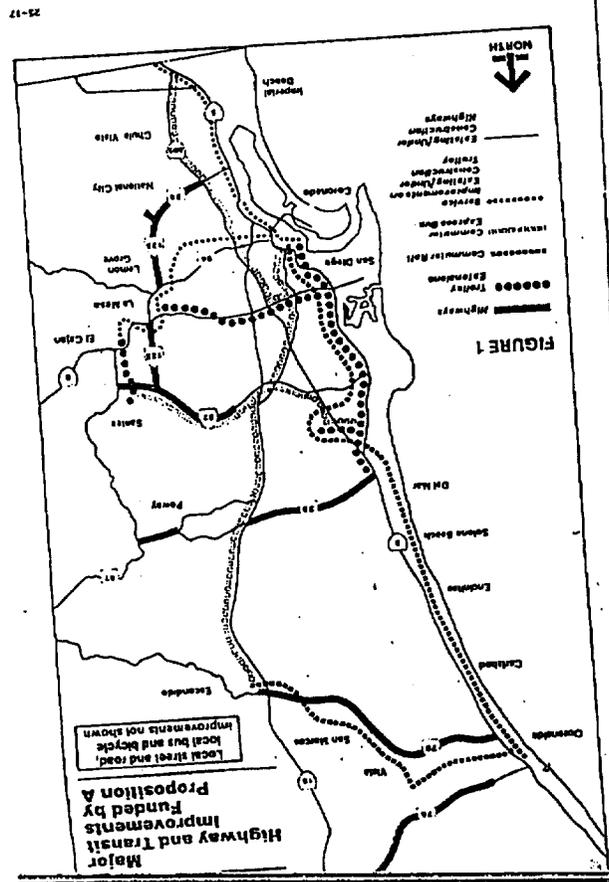
The cost of the WMV LRT presented to voters was \$150 million and has risen to at least \$220 million. The final tab is not in due to costly flood control (to eliminate trolley caused flood rises) at Ward Road that was legally required to be studied by FEMA and City codes before construction began in 1995. Believe it or not, this study has still has not been submitted to FEMA--over six years after what was legally required! What FEMA is now assessing is an incomplete flood hazard study which includes the trolley only as far east as Highway 163 (less than 1/2 the route)! More recently, MTDB has cleared wetlands (Ward Road area) in the floodway for the Mission Valley East LRT--again without FEMA's legally required consideration of flood hazards! Other flood control may eventually be required in the Stardust Golf Course area since FEMA (1997) reported an illegal rise of 1.01 ft (no rise was legal) resulting from the rebuilding of this course when the WMV LRT went through. This issue was reported by Gene Cubbison of Channel 39 in late 1997. In his report, he stood pointing down at Mission Valley and stated that FEMA had told him the City of San Diego was one of the three worst floodplain code violators in the entire Region 9 which includes hundreds of cities.

Cost of the EMV LRT presented to the voters on the Prop. A Ballot was \$150 million. The last estimate I heard from MTDB was that it would cost at least \$432 million! This is why the San Diego Taxpayers Association issued this trolley the infamous GOLDEN



CITY OF SAN DIEGO
PLANNING DEPARTMENT

(1985)



25-17

HPR-13-2002

25-18

The San Diego County Regional Transportation Commission orders as follows:

SECTION 1. TITLE. This ordinance shall be known and may be cited as the San Diego Transportation Improvement Program Ordinance and Expenditure Plan. (Commission Ordinance 87-1). The Expenditure Plan is set forth in Sections 2 and 4 herein.

SECTION 2. EXPENDITURE PLAN SUMMARY. This ordinance provides for the implementation of the San Diego Transportation Improvement Program which will result in countywide transportation facility and service improvements including highway improvements, bicycle, pedestrian, and public transit improvements. These needed improvements shall be funded by a one-half of one percent transactions and use tax established for a period not to exceed twenty years. The revenues shall be deposited in a special fund and used solely for transportation improvements. The specific projects in a special fund to be funded shall be further identified in the Expenditure Plan which is set forth in Section II of the document titled Proposition A, San Diego Transportation Improvement Program and is hereby incorporated by reference as if fully set forth herein. A summary of the major projects and programs, including the major highway and transit improvements depicted on Figure 1, is provided as follows:

A. HIGHWAY IMPROVEMENTS. One-half of the available revenues (estimated \$750 million) will be combined with federal, state and local revenues (estimated \$65 million) to complete the following projects (see Figure 1):

1. Route 52: Construct an initial lane freeway from Santee to Torrance to Route 57 in Santee - \$240 million.
2. Route 78: Widen freeway to 6 lanes from I-5 in Oceanside to I-15 in Escondido - \$40 million.

Proposition A
(This proposition will appear on the ballot in the following form.)

SAN DIEGO TRANSPORTATION IMPROVEMENT PROGRAM.
To help relieve traffic congestion, increase safety, and improve air quality by providing essential countywide transportation improvements, including:

- o Reduced traffic congestion by widening or building Highways 52, 78, 79, 80, 84 and 125;
- o Reduced price transit passes for seniors, students, and the disabled;
- o Expanded commuter transit services including "ramp" system, stations, San Diego State University, and San Diego - Jack Murphy, San Diego County, and other services improvements in South Bay and East County; and local bus improvements;
- o Increased safety through repair and improvement of local streets;
- o Construction of new bicycle routes;

shall the San Diego County Regional Transportation Commission be authorized to establish by ordinance a one-half of one percent transactions and use tax for a period not to exceed twenty years, with the proceeds placed in a special fund solely for transportation improvements?

SAN DIEGO TRANSPORTATION IMPROVEMENT PROGRAM ORDINANCE AND EXPENDITURE PLAN

P. 9

FLEECE AWARD--as a giant misuse of taxpayer money. Spending \$432 million for the paltry ridership quoted in the EIR (10,800/day) is totally irrational. A governmental agency that had community interests at heart would have said "These costs are so far out of line with what voters approved (for WMV LRT, EMV LRT, Santee LRT, Mid-Coast LRT), we must put this on the ballot again." Of course MTDB and SANDAG did not do this.

Gg-12

The cost of the Old Town line presented to voters was \$55 million. It ended up costing over twice that amount--\$114 million. The Santee line was supposed to cost \$35 million and ended up costing \$114 million (for a ridership of about 1,200/day)! MTDB replaced riparian habitat with a concrete channel for this boondoggle. The Mid-Coast line from Old Town to University City was presented to voters at a cost of \$130 million and is now projected to cost at least \$360 million! It should be clear that MTDB is simply not a credible agency. The facts show MTDB is fiscally irresponsible. Yet this agency is one of the driving forces behind this "vision for San Diego's future." *

Gg-13

We agree with MTDB that any development should be near transit and encourage people to non-auto trips. However, this is no excuse to densify this city's development and "condoize it" as MTDB and COV propose. MTDB would benefit financially from such density increases as it would help defray trolley operational expenses on low ridership routes such as WMV LRT. In other words, they have a financial stake in seeing that the Stardust Golf Course is developed since this would provide more riders for WMV LRT. That this would wipe out the last large open space in the valley and a historic recreational area is no problem for MTDB. They did so with the River Valley Golf Course/Sports Center and did not consider its closure an impact to recreational resources. It is this kind of bulldozer mentality that is driving COV.

Gg-14

With the COV proposal, what percentage of ADTs would be on trolley as compared to now? On busses as compared to now? In cars as compared to now? Bikes? Walking? The DEIR states "for all trips, the transit use and walking was estimated to comprise 6% citywide. It appears that traffic model result shows that the use of personal vehicles, although with increased occupancy, still remain the predominate preferred mode of transportation for any scenario in the year 2020." (p. IV-30). Even counting walking to locations as a "trip," still 94% of the trips would be by auto with Transit First!! If I counted my walking "trips" to store and other areas, I estimate that only about 70% of my trips are by car. These future figures (94% of trips by car, even counting walking as a trip) disclose what a dismal failure Transit First would be.

STAFF RESPONSE Gg-13: Comment noted. As discussed in the distributed DEIR, the Goals and Objectives section, the proposed Strategic Framework would work in conjunction with the MTDB Transit First Concept. MTDB has approved plans for extension of the East Mission Valley transit line. Implementation of the proposed Strategic Framework would not alter the efforts of MTDB to implement the trolley line extension. Considering the trolley line extension project is approved and will be implemented by MTDB regardless if the proposed Strategic Framework Element is approved or not approved, the background information and comments on the extension of the trolley line do not comment on the adequacy of the EIR (See CEQA Guidelines Section 15204) in identifying significant impacts related to the proposed Strategic Framework Element.

STAFF RESPONSE Gg-14: Refer to previous Staff Responses Gg-10 and Gg-13.

* See pages 21, 22 of comments (final page)

P. 10

POPULATION FORECASTS ARE HIGHLY SPECULATIVE AND CAN BE SELF-FULFILLING

Gg-15

This DEIR presumes that population will increase 20% in the next 20 years. On that basis, it proceeds to approve higher density limits on a city wide basis. THIS IS HIGHLY IRRATIONAL. Many times, such forecasts are wrong. For example, Santee experienced significant growth in the 1980's. Yet between 1990 and 2000, its population remained almost identical. What if we forecast no population increases for San Diego and took every possible step to make that a reality? Chances are we would have little or no growth. It is unreasonable to essentially upzone (and increase value of) thousands of acres in the city on the basis of a dubious assumption. For example, just last year the federal government was forecasting trillions of dollars in government surpluses. A year later, the forecast has been revised 4 trillion dollars downward according to ABC Nightly News. Circumstances and times have changed and huge government deficits are now forecast for at least this and next year when just a year ago, huge surpluses were considered nearly certain.

Gg-16

While the EIR includes specific air pollution increases (tons/day) and traffic increases (180,000-240,000 auto trips/day) as a result of this proposal, no analysis is done of how many people might be displaced by such "innovative redevelopment." This information is vital for the public and decision makers. Such analysis should be done and the EIR recirculated with it. Without such analysis the DEIR is legally inadequate since its true impacts on human lives are not considered. Such impacts are routinely included in EIRs such as for the West Mission Valley LRT and the Forrester Creek channelization project in Santee.

IF YOU BUILD IT THEY WILL COME; IF YOU DON'T THEY WONT

Gg-17

This DEIR is legally defective because it does not present an adequate "no growth" alternative. It simply states that a local government could not possibly bring about "zero population growth" here. This is defeatist thinking and could become a self-fulfilling prophecy. More than one European nation has brought about zero (or even declining) population growth. These nations should be studied in detail for ideas on how they have done so-- and their ideas incorporated into a recirculated EIR with reasonable plans to stabilize the population. In San Diego County, the cities of Del Mar (less population in 2000 than 1990), Imperial Beach, Lemon Grove, La Mesa, Solana Beach, National City (less population in 2000 than 1990) have stabilized their populations over the last decade. Del Mar has had a stable population for the last 30 years! You don't see these cities proposing COV density increases! These cities see themselves as mostly "built out" and simply refuse to build "up."

STAFF RESPONSE Gg-15: Information on impact of the project and the no project alternative on the percentage of daily transit and walking trips by trip type and the peak -off-peak period for four scenarios are included in Table B-4 of the distributed DEIR. The percentages by ADT requested in the comment were not calculated as a part of the analysis of transit ridership completed for the project considering that impacts to transit could be calculated at the program EIR level utilizing the ridership estimates included in Table B-4.

STAFF RESPONSE Gg-16: Refer to previous Staff Response Gg-13.

STAFF RESPONSE Gg-17: The areas depicted for potential Urban Villages and Neighborhood Village Centers as a part of the proposed project (See attached City of Villages Map) are generally restricted to urbanized areas with some vacant land or existing commercial or industrial uses. As a result, displacement of residences or other land uses associated with redevelopment of those areas is anticipated to be minimal.

Potential impacts regarding redevelopment of specific land uses are not within the scope of this EIR. As discussed in the Project Description chapter of the distributed DEIR, the proposed project addressed by the DEIR is the proposed Strategic Framework Element. The Strategic Framework Element and 5-Year Action Plan are intended to guide the future update of the Progress Guide and General Plan as well as the City's 43 community plans through 2020. These subsequent updates would provide for the necessary zoning changes and other legal requirements to implement a new growth and development strategy outlined in this proposed element. Any environmental impacts associated with specific redevelopment projects will be addressed in CEQA documents prepared for those subsequent community plan updates.

P. 11

See email from City of Solana Beach Director of Community Development Steven Apple (p. 12 of these comments) "As a 95% built out City, the lack of buildable vacant land serves to control growth--and during the past decade, we average approximately 10 new homes a year."

See email from City of Lemon Grove City Manager Bob Richardson (p. 13 of these comments) "The City is built out and therefore population will continue to reduce. No other control measures are needed."

See email from City of Imperial Beach (Dave Van de Water) (p. 14 of these comments): "From my perspective, the city is pretty much 'built out'--so our population is relatively stable, because we are small, physically, and can't grow much more physically."

Gg-18 See email from City of Del Mar (p. 15 of these comments): "Del Mar is a community of 5,000 that has had a stable population for 30 years. The community is almost entirely built out, so we do not have a growth control program."

Also, see SANDAG census data of 1990 compared to 2000 (pp. 16, 17 of these comments). Del Mar, National City and Coronado have fewer residents listed in 2000 compared to 1990. Santee, Solana Beach and Imperial Beach had tiny "in the noise" increases; Lemon Grove and La Mesa had minimal increases between 3% and 4% for the decade.

San Diego should likewise view itself as mostly built out and refuse to "build up" as these cities which have CHOSEN NOT TO GROW ANYMORE! You don't see them proposing COV density increases and this is an obvious option for San Diego.

Gg-19 SANDAG forecasts the majority of population increases resulting from the existing population. This does not appear credible in view of Del Mar, Santee, Solana Beach, Imperial Beach, and National City's lack of growth. That is, if population growth was mostly generated from existing residents (rather than people moving here), at least some of these cities would have had growth similar to San Diego.

Gg-20 Rents could be controlled as they are in other cities--rent control tied to cost of living increases.

Gg-21 This DEIR proposal/scheme, like many others locally, is backed by the real estate, construction, and developer industries. The motivating factor is to increase property values and related profits. All kinds of scare techniques are used to make this option seem like the "ONLY RATIONAL ALTERNATIVE." If the people of San Diego accept this false and misleading vision, we could become known as the "CITY OF VILLAGE IDIOTS" and CITY OF VILLAGE SARDINES.

STAFF RESPONSE Gg-18: The objective of the proposed Strategic Framework effort is to ultimately increase density in urbanized areas beyond that currently approved in existing community plans to accommodate projected growth. Refer to previous Staff Response Gg-2 for additional information on regional population projects and housing supply shortage to be addressed by the proposed project.

Evaluation of the impacts of a no growth alternative was, therefore, beyond the scope of the project objectives and the analysis completed for the distributed DEIR. A primary objective of the project is to address housing demand associated with projected growth. In accordance with CEQA Guidelines Section 15126.6, an EIR shall describe a range of reasonable alternatives to a project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR is not required to consider every conceivable alternative to a project.

STAFF RESPONSE Gg-19: Methodology utilized for SANDAG population estimates and Year 2020 forecasts are available for public review by SANDAG. Population projects utilized for the 2020 forecasts factor in growth in the region that is generated from sources other than existing residents.

STAFF RESPONSE Gg-20: Comment noted. Implementation of the Strategic Framework Element would address issues beyond rental prices. An objective of the Strategic Framework element is to increase density in urbanized areas beyond that currently approved in existing community plans to accommodate projected growth. See response to comment number 2 for additional information on regional population projects and housing supply shortage to be addressed by the proposed project.

STAFF RESPONSE Gg-21: Comment noted. Refer to previous Staff Response for additional information on requirements for public review comments and consideration of socioeconomic effects in an EIR.



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Date: Wed, 6 Feb 2002 12:11:11 -0800
From: Steve Apple <sapple@cosb.org> [add to address book] [add to spam block list]
Subject: RE: A Question or Comment for the City Manager's Office
To: "jrb2@angelfire.com" <jrb2@angelfire.com>, Matilda Hlawek <mhlawek@cosb.org>

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Randy:

We do not maintain year by year estimates of City population -however a great deal of Census data and estimates is available at this SANDAG web site
<http://www.sandag.coo.ca.us/> - you may also want to check out our web site again as it has a link to this SANDAG year 2000 census data.

As a 95% built out City, the lack of buildable vacant land serves to control growth - and during the past decade, we averages approximately 10 new homes a year - hope that helps!

Steven A. Apple, AICP
Director of Community Development
City of Solana Beach
635 South Highway 101
Solana Beach, CA 92075-2215

City Web Site: www.ci.solana-beach.ca.us

-----Original Message-----

From: Matilda Hlawek
Sent: Wednesday, February 06, 2002 8:49 AM
To: Steve Apple
Subject: FW: A Question or Comment for the City Manager's Office

Steve,

Could you please answer this inquiry.

Matilda

-----Original Message-----

From: system@ddstech.net [mailto:system@ddstech.net]
Sent: Wednesday, January 30, 2002 1:50 PM
To: mhlawek@cosb.org; lserlet@cosb.org
Subject: A Question or Comment for the City Manager's Office

A Question or Comment from the City of Solana Beach Website has been



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Date: Wed, 6 Mar 2002 10:56:29 -0800
From: Bob Richardson <brichar@ci.lemon-grove.ca.us> [add to address book] [add to spam block list]
Subject: RE: stable population
To: "jrb2@angelfire.com" <jrb2@angelfire.com>

The City is built out and therefore population growth will continue to reduce. No other control measures are needed.

-----Original Message-----

From: Randy Berkman [mailto:jrb2@angelfire.com]
Sent: Wednesday, March 06, 2002 9:49 AM
To: Bob Richardson
Subject: stable population

According to SANDAG census data, Lemon Grove has not that many more people in 2000 than in 1990. How have you accomplished this? do you have growth control ordinances or policies?

thanks, rb

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1990 CENSUS

Geography	pop
City Carlsbad	62,846
City Chula Vista	135,210
City Coronado	26,540
City Del Mar	4,860
City El Cajon	88,768
City Encinitas	55,779
City Escondido	108,765
City Imperial Beach	26,512
City La Mesa	52,956
City Lemon Grove	23,984
City National City	54,273
City Oceanside	128,395
City Poway	43,516
City San Diego	1,110,549
City San Marcos	39,307
City Santee	52,902
City Solana Beach	12,962
City Vista	72,129
City Unincorp	397,783

Source: San Diego Association of Governments, 2001

Label	Description
pop	Total population

CENSUS 2000 - Summary File 1 Data

Geography	pop
City Carlsbad	78247
City Chula Vista	173556
City Coronado	24100
City Del Mar	4389
City El Cajon	94869
City Encinitas	58014
City Escondido	133559
City Imperial Beach	26992
City La Mesa	54749
City Lemon Grove	24918
City National City	54260
City Oceanside	161029
City Poway	48044
City San Diego	1223400
City San Marcos	54977
City Santee	52975
City Solana Beach	12979
City Vista	89857
City Unincorp	442919
2000 Tracts 1.00	3024
2000 Tracts 2.00	5984
2000 Tracts 3.00	4446
2000 Tracts 4.00	3466
2000 Tracts 5.00	2756
2000 Tracts 6.00	2963
2000 Tracts 7.00	3414
2000 Tracts 8.00	4218
2000 Tracts 9.00	5594
2000 Tracts 10.00	4948
2000 Tracts 11.00	3103
2000 Tracts 12.00	5641
2000 Tracts	

P. 18

Gg-22 It is likely that the majority of people in San Diego would choose to stabilize the area's population so that quality of life would be preserved. If government leaders put their minds to it and led people in that direction, it would occur. That it hasn't--shows the continued inordinate influence of the developer/construction industry on elected politicians.

Gg-23 The DEIR states that 240,000 more ADTs could be added from this proposal and correctly notes that this would be a significant unmitigated impact. Please show where LOSs would be worsened as a result of this proposal and by how much. Where would this occur where LOS is already E or F if any of the proposed villages were built?

Gg-24 The DEIR does list some of the increased pollutants that would occur as a result of this project. The increases on a daily basis are staggering: listed in tons of nitric oxide, carbon monoxide, and organic gases. Medical-pollutant experts need to review this information so the public is informed about the likely effect on our health. Have studies been done in other cities which have such high density/vast majority of trips by car to monitor air pollution at such residential areas? If so, what are the results compared to less densely populated areas? Specifically, how many more people would develop lung cancer when located near new pollution centers of these dense developments? Lung and heart diseases? Other medical problems as a result of this increased daily tonnage of pollutant material. Would the City of San Diego be willing to assume the costs of medical treatment for the higher number of deaths and illnesses which might occur near or in these pollutant-trap-villages? Since the answer is "of course not," the City has no business approving such a proposal.

Gg-25 What about the added pressure to develop Mission Valley floodplains such as the Stardust (aka "Riverwalk") golf course? Isn't this added pressure inconsistent with the San Diego General Plan which states: "Prohibit development in floodplains." and the City Council Policy 600-14 "Development in Areas of Special Flood Hazard" which begins: "Development in areas of special flood hazard is unwise from a health, safety and general welfare standpoint."

Gg-26 The CEQA (14 CA Code Regs, Ch.3, Sec. 15021(a)(2)) states "A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment." This proposal cannot be approved since there are options available which would eliminate the significant unmitigated impacts to traffic, air pollution and waste disposal (pp. 111-iv) which would occur with COV.

Gg-27 COV would be a gold mine for landowners, real estate brokers,

STAFF RESPONSE Gg-22: Comment noted. Refer to previous Staff Response Gg-18 on why, in accordance with CEQA guidelines Section 15126.6, evaluation of the impacts of a no growth alternative was beyond the scope of the project objectives and the analysis completed for the distributed DEIR.

STAFF RESPONSE Gg-23: The complete traffic analysis results completed by SANDAG was included as Attachment 3 to the DEIR. As shown in Attachment 3 and as summarized in Table B-4 of the FEIR, the traffic analysis completed for the project did not identify level of service changes generated by the project at specific locations. As subsequent implementing discretionary actions such as community plan amendments, rezones, or permits are required for larger village development, more specific traffic analysis would be required. The subsequent traffic analysis may refine the contribution of the alternative transportation modes and as a minimum; traffic impacts could be further reduced.

STAFF RESPONSE Gg-24: As discussed under Significance and Mitigation in Air Quality of the DEIR pollutants generated from implementation of the 17,000 to 37,000 additional units and associated traffic generation would exceed City standards. However, vehicle trip reduction measures incorporated into the Strategic Framework Element and the mixed use developments associated with the potential Urban Villages including improved transit, and proximity of residential areas to employment areas (See Table C-7) would serve to reduce some pollutants generated and would be considered an environmental benefit of the project to air quality.

Regional air quality standards enforced by the San Diego Air Pollution Control District are in place to address impacts to ambient air quality that would represent significant health hazards like those described in the comment. As discussed in Air Quality section of the DEIR assuming a maximum of 37,000 additional homes associated with the proposed project, the project would not significantly deteriorate ambient air quality for the region's current air quality concern ozone. The population generated by the 37,000 homes would be less than 3% of the previously projected population of 2020 and, therefore, motor vehicles accommodated by this plan would not adversely affect regional air quality effort to attain the ozone standard. However the estimated pollutants definitely exceed the City's threshold for significance; therefore, air quality was determined to be significant and unmitigated.

STAFF RESPONSE Gg-25: Subsequent development of potential Urban Village Centers are anticipated within the Mission Valley area (see City of Villages Map). However, it is anticipated that the type of uses proposed for the Urban Village Centers could be designed in accordance with City standards to ensure that future residents or uses are not subject to significant health and safety concerns that could be associated with development in a special flood hazard area. In addition, as discussed in the Project Description chapter, the proposed project addressed by the distributed DEIR is the proposed Strategic Framework Element. Any environmental impacts associated with specific redevelopment projects will be addressed in separate CEQA documents prepared for these subsequent projects.

STAFF RESPONSE Gg-26: In accordance with CEQA, the distributed DEIR did consider the No Project Alternative. The No Project alternative would avoid the impacts of the proposed project to traffic, air pollution and waste disposal.

The distributed DEIR considered, in accordance CEQA Section Guidelines 15126.6, an alternative that would meet basic objectives of the proposed project with respect to accommodating projected regional housing demand. In accordance with CEQA Guidelines Section 15126.6, an EIR shall describe a range of reasonable alternatives to a project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. A slow growth/reduced intensity alternative was considered in the distributed DEIR that would reduce impacts to traffic and air quality by reducing the number of housing units to be developed. However, considering the regional nature of issues such as traffic and air quality it was determined that the reduced intensity alternative would not necessarily reduce the contribution of the proposed project to regional traffic and air quality impacts to below a level of significance.

STAFF RESPONSE Gg-27: Comment noted. Providing information on possible financial impacts to individuals or organizations associated with the project would not address the sufficiency of the CEQA document in accordance with CEQA Guidelines Section 15204 and 15131. Refer to previous Staff Response Gg-6 for additional information on requirements for public review comments and consideration of socioeconomic effects in an EIR.

P. 19

banks, architects, and consultants. For example, Fehlman-Lebarre, an architectural firm, is on the citizen's advisory board for COV. They were the architects for the ill-fated Chevron-Levi-Cushman plan to develop the Stardust Golf Course. They could be expected to be re-employed if this plan is resubmitted as a COV.

Levi-Cushman Specific Plan

Gg-28

Please clarify what is stated in the DEIR about this Plan. Would even more residential density be allowed for this proposed plan than was City approved in 1987 (1,300 condos, 2+ million square feet of offices, 1/4 million square feet of retail)? Would this DEIR be giving the go ahead to the revised Levi-Cushman Plan (never submitted to Council and abandoned by Chevron in 1992) which proposed 2,500 condos and a high rise hotel, and significant office space on what is now the Stardust Golf Course (aka Riverwalk)? Have the Levi and Cushman families been instrumental in promoting this "City of villages" concept? They were instrumental in getting this land upzoned in the Mission Valley Community Plan of 1985--when they sat on the local planning group. Such a plan appears to conflict with Sec. 404(b) of the Clean Water Act which states that projects in wetlands must be water dependent. An official at EPA informed me that putting condos and offices in "waters of the U.S. is not a water dependent project."

Gg-29

When a city is a "serious non-attainment region" for state air quality standards, it is highly irresponsible to propose adding 13.5 to 28+ tons of air pollutants per day compared to the pollution projected with the existing General Plan. This is crazy and if the people know the truth they will not allow it. If people know the truth that this proposal (again, compared to the existing General Plan) would add at least 180,000 to 240,000 auto trips daily (equivalent to another I-8) on an already overburdened road system, they will not allow it. They will see a nightmare of increased traffic and pollution, and the likely crime increases which go with such deteriorating quality of life.

Gg-30

What impacts would the increased air and water pollution have on wildlife and habitat?

Gg-31

CONCLUSION: Low density, near transit, mixed use developments can be quite convenient and pleasant for residents. However this high density COV amounts to "they get the gold (landowners get increased property values) and taxpayers get the triple shaft" of huge increases in traffic and air pollution; as well as paying for the bandaid mitigation of Transit First; and paying for redevelopment funding to evict an unspecified number (thousands?) of people from their homes. This proposal makes the infamous Charger seat guarantee look like an excellent deal in comparison.

STAFF RESPONSE Gg-28: The subsequent development of potential Urban Village Centers is anticipated within the Mission Valley area (see City of Villages Map attached to the FEIR). The Levi Cushman Specific Plan is described on page IV-6 of the DEIR. It is anticipated that this plan would need to be amended to accommodate subsequent projects developed in accordance with the Strategic Framework Element. However, as shown on the City of Villages Map, development of Urban Village Center uses would involve similar types of mixed uses including residential and commercial to that anticipated for the area in the approved Levi-Cushman Specific Plan. In addition, any specific environmental impacts associated with future redevelopment in Mission Valley will be addressed in CEQA documents prepared for these subsequent projects.

STAFF RESPONSE Gg-29: Comment noted. As discussed further in responses to comment 26, vehicle trip reduction measures incorporated into the proposed Strategic Framework Element and the mixed use developments associated with the potential Urban Village Centers including improved transit, and proximity of residential areas to employment areas (See Table C-7) would serve to reduce some pollutants generated and would be considered an environmental benefit of the project to air quality. In addition, as discussed in the Project Description the distributed DEIR, the proposed project addressed is the proposed Strategic Framework Element. Any environmental impacts associated with future redevelopment will be addressed in second-tiered, CEQA documents prepared for these subsequent projects.

STAFF RESPONSE Gg-30: As discussed in Section VII-I Effects Found Not to be Significant, it is not anticipated that implementation of the Strategic Framework would result in significant impacts to biological resources. The proposed project would result in infill and redevelopment of areas with existing development. The proposal generally affects the City's long-established, urbanized areas and would not result in significant adverse effects on sensitive areas.

In addition, the proposal was designed to avoid adjacency concerns such as indirect or direct impacts to water quality with the City MHPA preserve areas. Section 1.4.3 of the City MSCP Subarea Plan requires that all projects proposed adjacent to sensitive biological resources associated with the MHPA must conform with the Subarea Plan Land Use Adjacency Guidelines. The Land Use Adjacency Guidelines specify that drainage from development projects must not drain stormwater runoff directly into the MHPA. If runoff is to drain into the MHPA, measures must be included in the project design to prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade the natural environment.

Regional air quality standards enforced by the San Diego Air Pollution Control District are in place to address impacts to ambient air quality that would represent significant health hazards like those described in the comment. As discussed further in response to comment number 25, the population generated by the proposed 17,000 to 37,000 homes would be less than 3% of the previously projected population of 2020 and, therefore, motor vehicles accommodated by this plan would not adversely affect regional air quality effort to attain the ozone standard.

STAFF RESPONSE Gg-31: Comment noted. Refer to previous Staff Responses Gg-6, Gg-23, and Gg-24 for responses to issues related to increased property values, traffic impacts and air quality impacts raised in this comment.

P. 20

Gg-32 There is no option of COV without the density increases; and a required added open space. In short, this is a developer's dream. It is being sold as a way to reduce traffic when it does just the opposite. The map in DEIR showing potential village sites ranges from San Ysidro to Rancho Bernardo--about 55 miles. This is new, major sprawl in a COV package--especially since 94% of city trips are forecast to be by car, even with the dubious trip counting method of including walking as "trips."

Gg-33 There is no study of other cities in the county that have attained a stable (or no growth) population over the last decade and the fact that these cities have chosen not to grow; information from these cities is part of these comments. It is highly irrational to use a planner's population forecast to rationalize massive traffic, pollution and waste impacts to residents of San Diego County and tourists. No one has a crystal ball on future population here. As by far the most damaging option, the proposed COV cannot be approved under CEQA Sec. 15021(a)(2).

Gg-34 Pages 21 to 24 are part of these comments for FEIR inclusion as they relate to the credibility of MTDB, one of the driving forces of COV. Page 21 of these comments shows prices of trolley routes presented to voters on the 1987 Proposition A Ballot; compared to actual trolley costs or currently projected costs for lines not yet built.

Randy Berkman *Randy Berkman*
River Valley Preservation Project
email: jrb2@angelfire.com

March 13, 2002

These comments may be amended.

STAFF RESPONSE Gg-32: Comment noted. Refer to previous Staff Responses Gg-6, Gg-23, and Gg-24 for responses to issues related to traffic impacts and air quality impacts raised in this comment.

STAFF RESPONSE Gg-33: Comment noted. Refer to previous Staff Response Gg-18 regarding a no growth alternative. Evaluation of the impacts of a no growth alternative is beyond the scope of the project objectives and the analysis completed for the EIR. One of the major objectives of the project is to address housing demand associated with projected growth. In accordance with CEQA Guidelines Section 15126.6, an EIR shall describe a range of reasonable alternatives to a project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR is not required to consider every conceivable alternative to a project.

STAFF RESPONSE Gg-34: Comment noted. Refer to previous Staff Responses Gg-10 and Gg-12 for responses to issues related to the role of MTDB in the proposed project.

1997-1998 (1997)

- 4. **Route 78 Corridor Reserve:** Reserve fund for highway-related interchange and arterial improvements and additional Route 78 widening - \$40 million.
- 5. **Route 78:** Widen to 4 lanes from Frontier Drive in Oceanside to I-15 - \$100 million.
- 6. **Route 84:** Widen South Bay Freeway to 6 lanes including Route 125 interchange and connector to San Miguel Road - \$20 million.
- 7. **Route 56:** Upgrade an initial city arterial to 4- and 6-lane freeway between I-5 and I-15, with no Proposition A expenditures in a designated "future unbundling" area - \$65 million.
- 8. **Route 56:** Widen the Poway Road grade to 4 lanes from Espola Road to Route 67 in Poway (cost-sharing project) - \$10 million.
- 9. **Route 125:** Construct an 8-lane freeway between Routes 54 and 84 in the Lemon Grove/Spring Valley area - \$50 million.
- 10. **Route 125:** Construct a 6-lane freeway from Fletcher Parkway in La Mesa to Route 52 in SanDiego - \$135 million.
- 11. **Project Reserve Fund:** Route location, right-of-way protection, environmental fund - \$25 million.

B. TRANSPORT IMPROVEMENTS. One-third of the available revenues (estimated \$750 million) will be combined with federal, state, local and private funding (estimated \$180 million) for implementation of the following projects (see Figure 1):

- 1. **Extensions of the San Diego Trolley:**
 - a. From Downtown San Diego to Old Town - \$55 million.
 - b. From Old Town through Mission Valley to the Stadium - \$150 million.
 - c. From Old Town north to the North University City area - \$130 million.
 - d. From the Stadium east via San Diego State University to La Mesa - \$150 million.
 - e. From North University City to North City West - \$100 million.
 - f. From El Cajon to SanDiego - \$50 million.
- 2. **Commuter Rail Services:**
 - a. Between Oceanside and Downtown San Diego - \$70 million.
 - b. Between Oceanside and Escondido - \$60 million.
- 3. **Transit Service Improvements:** Total \$150 million
 - a. Reduced-pollution transit passes for seniors, the disabled, and students.
 - b. New and expanded trolley, commuter express bus, local bus, and disabled services.
- 4. **Project Reserve Fund:** Total \$40 million - Right-of-way protection, project studies, environmental work, including up to \$1 million for a detailed analysis of trolley extensions in the South Bay.
- 5. **BICYCLE FACILITY IMPROVEMENTS.** A total of \$1 million per year will be allocated for the provision of improved bicycle routes throughout the region.

D. LOCAL STREET AND ROAD IMPROVEMENTS. One-third of the available revenues (estimated \$750 million) will be allocated on a fair and equitable formula basis (Section 4(c)) to each city and the County of San Diego (hereinafter referred to as local agencies) to supplement existing local revenues. These revenues will be used to repair and rehabilitate existing roadways, to reduce congestion and improve safety, and to provide for the construction of needed facilities. Each local agency will prepare a listing of the projects proposed for funding through the measure with public participation required.

SECTION 3. IMPOSITION OF TRANSACTIONS AND USE TAX. In addition to any other taxes authorized by law, there is hereby imposed in the County of San Diego, and in each city and the County of San Diego, in accordance with the provisions and unincorporated portions of the County of San Diego, in accordance with the provisions of Part 1.0 of the Public Utilities Code and Section 7231 of the Revenue and Taxation Code, a transactions and use tax at the rate of one percent (1%) for a period not to exceed twenty years in addition to any existing or future authorized state or local transactions and use tax, which fund this project, additional state or local revenues become available which will fund this project and services contained in the Regional Transportation Plan, then the tax shall be reduced by action of the Commission.

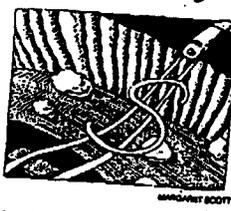
SECTION 4. EXPENDITURE PLAN PURPOSES. The revenues received by the Commission from this measure, after deduction of required Bonded Equalization costs for performance of the functions specified in Section 13204(9) of the Public Utilities Code, shall be used to improve transportation facilities and services. Regional Transportation Plan and the Superior Regional Transportation Improvement Program, and for the administration of the San Diego County Regional Transportation Act (hereinafter referred to as the "Act") commencing with Public Utilities Code Section 132000. After the deduction of administrative expenses and the allocation of one million dollars annually for bicycle facilities, the revenues shall with the exception of the conditions set forth herein be allocated as follows:

- 1. One-third for transit purposes;
 - a. One-third for local street and road purposes; and
 - b. One-third for highway purposes.
- 2. The revenues made available for transit purposes shall be allocated and expended pursuant to the following distribution formula and priorities:
 - 1. One percent of the total funds made available annually for transit purposes shall be used to support improved transportation services for seniors and disabled persons. These funds shall be allocated in a similar manner as funds made available through Section 89275 of the Public Utilities Code.
 - 2. Remaining transit revenues shall be allocated according to the North San Diego County Transit Development Board and the Metropolitan Transit Development Board based on the population within each board area of jurisdiction using the most recent Department of Finance population estimates. These funds shall be expended in the following manner:
 - a. Not less than thirty percent shall be used to implement the rail car facilities identified in the Expenditure Plan. However, in no case, shall the use of revenues under this section preclude the use of revenues necessary to implement Section 89275.

Mission Valley trolley line: A transportation travesty

During the height of California's five-year drought, San Diego voters approved a ballot proposition to build a six-mile, \$150 million extension of the trolley system through Mission Valley. What sponsors of the measure neglected to mention was that the plan called for the trolley to be built smack dab in the middle of a flood plain, alongside the San Diego River.

The folly of this plan has become ridiculously obvious now that the drought is over. San Diego has experienced about a dozen rainy days so far this year, and on each occasion the river has overflowed its



sleek, high-tech light rail systems — like Washington, D.C.'s Metro, San Francisco's Bart, Miami's Metro and Atlanta's MARTA — have failed to attract projected levels of ridership and thus require huge

Joseph Perkins

boundaries. But local government officials in San Diego are alarmed if they're going to let a little problem like flooding dissuade them from building their trolley. They plan to break ground on the light rail project May 1 — unless, of course, it happens to rain.

The mass transit travesty that is playing out in San Diego has occurred in cities and counties throughout the country. The local power structure (selected officials, deep-pocket developers, corporate elites that the lumpenproletariat ought be encouraged to abandon their saaty, old subway, trolleys or "people movers". They draw up specs for mass transit projects that almost always overestimate ridership and environmental benefits, while grossly underestimating both construction and operating costs.

These extravagant light rail systems become a drain on local government coffers.

In the end, these extravagant light rail systems become a drain on local government coffers, costing far more per passenger mile than alternative (but less glamorous) modes of mass transit, like buses and commuter vans.

Again, San Diego provides a ripe example. The price tag for the Mission Valley trolley has increased nearly \$100 million from the original estimate. Daily ridership is now projected to be little more than a third of the 42,000 originally sold to voters (which came as a surprise to the Mission Valley trolley's No. 1 cheerleader, Councilwoman Valerie Stallings, who mistakenly thought the six-mile route would serve 100,000 riders).

subsidies from local government. In fact, the American Public Transit Association documented that in 1993 rider fares nationwide covered only 41 percent of the \$17 billion cost of operating local transit systems. That means that city and county governments had to spend \$11 billion in public funds — tax dollars — to keep their gold-plated subways and trolleys and "people movers" from sinking in a flood plain of red ink.

And local governments don't even dream of recouping the billions of tax dollars they have spent to build their light rail systems. If these capital costs are factored in with the annual operating cost of more than \$20 billion a year in taxpayer subsidies.

Because the trolley will serve so few riders, it will have no "appreciable" impact on traffic congestion in Mission Valley, according to the latest environmental impact report. Thus, this white elephant is the making — or should we say "wet elephant" — will not bring San Diego closer to compliance with federal and state air quality standards as its supporters originally claimed.

Yet would think that San Diego city officials would have learned something from the costly experiences of other municipalities. Indeed, even those cities that boast

The public is starting to catch on to these mass transit boondoggles. Last November, for instance, voters in California, in Denver, in Boulder and in Phoenix were asked to approve urban transit ballot initiatives. All four measures were overwhelmingly defeated.

Similarly, in February, residents of Clark County, Wash., voted not to link up with the light rail system of neighboring Portland, Ore. And earlier this month, voters in three Seattle-area counties rejected a ballot proposal to build a new 70-mile rail system in the Puget Sound region.

What we are witnessing in cities throughout the country is a backlash against government-funded mass transit projects. It's not that the commuting public is unconcerned about traffic congestion and air quality, it's that they realize that light rail systems cost way too much for the limited number of riders they serve.

Cost of the next SDSU trolley leg rises \$78 million

By Mark Arner, STAFF WRITER

The cost of the next segment of the San Diego trolley, from Mission Valley to La Mesa, has gone up by \$78 million to reach \$439 million.

Directors of the Metropolitan Transit Development Board got the news yesterday and were none too pleased.

But when they got a load of the public art proposed for some of the stations, and saw the cozy living-room look planned for the Alvarado Medical Center stop, they flipped.

Director Lori Howard from Santee quipped that the station, with its couches, lamps and fireplaces, looked "like a welcome wagon to transients."

County Supervisor Ron Roberts called it a "lousy station" and said he would have trouble raising money for the project if it were accepted.

"I know it may sound petty," Roberts said, "but I wonder how serious people are about the budget. I'm having trouble not just laughing at the plan."

Originally, the plan was to build the 5.9-mile segment for \$361 million. The route would extend from the terminus just east of Qualcomm Stadium to San Diego State University and link up with the trolley's Orange Line in La Mesa. Yesterday, reasons for the 21.6 percent increase in the Mission Valley East project were outlined by Dave Ragland, the board's senior construction

Trolley

Cost to build next segment up \$78 million

Continued from B-1

engineer.

■ It will cost \$27 million more than expected to build a tunnel up a hillside between Interstate 8 and SDSU.

■ Building an underground station on campus will cost \$7 million more than first estimated.

■ The "mobilization costs" of contractors at the start of construction went up by \$12 million.

■ The rest of the increase generally included inflation, costs to relocate utilities and costs to strengthen buildings the trolley will pass.

The increase comes amid efforts to raise more federal funds for the project. Congress is debating whether to spend \$23 million on it this year, and it needed roughly \$280 million more to be finished by 2004. That was before the increase.

"We're doing a lot of work fighting for these dollars," Roberts said. "I don't want to spend a lot of time fighting for something I don't believe in."

MTDB General Manager Tom Larwin insisted that he and Ragland were concerned about the costs, and he promised to suggest budget cuts at a meeting Sept. 9.

He also agreed to limit costs for public art at the project's four stations at Grantville, Alvarado Medical Center, 70th Street and SDSU.

If completed by 2004, the project could cut travel time from East County to Mission Valley. A public transit trip from Santee to Qualcomm Stadium, for example, would go from 80 minutes to about 30 minutes.

The 45-mile trolley system was most recently expanded in 1997 with the opening of a \$220 million, six-mile segment from Old Town to Qualcomm Stadium, ending at Ward Road.

The trolley now provides daily service between downtown San Diego and San Ysidro, Santee and Mission Valley and attracts more than 23 million riders a year.

\$150 million was the cost presented to voters

TROLLEY on Page B-6

8-13-99 San Diego Union-Tribune

Ridiculous amounts — for tiny results

Re: "Cost of the SDSU trolley leg rises \$78 million" (B-section, Aug. 13):

The East Mission Valley Trolley line cost is now projected to cost \$439 million, an increase of 20 percent from prior estimates.

If \$439 million were invested at 7 percent, the annual return would be about \$31 million. This would cover the annual taxpayer cost of operating San Diego Transit's entire bus system, or enable the doubling of current routes — which now carry about 100,000 riders/day. Compare that to the 10,000 riders/day expected from this trolley.

Even the Metropolitan Transit District Board directors are finally exasperated at the cost. No doubt MTDB staff will find ways to cut costs and convince directors to keep spending ridiculous amounts for tiny results.

RANDY BERKMAN
San Diego

8-18-99 San Diego Union-Tribune

MTDB judges its figures
Metropolitan Transit Development Board's eminent domain legal fight with Handley Hotels (Daily Tribune, Jan. 9, 1998) could have been avoided by redefining the West Mission Valley Trolley on the middle of Friary Road parallel to the Standard Golf course. MTDB's allegations that the route through the Standard is the "most efficient" is another in a series of lies about this trolley.

According to court papers, MTDB paid Standard \$130 million for the trolley right of way and got course reconstruction. The cost of building a mile-long, 30-foot-tall trolley berm through the course, dead control easements of a mile of the San Diego River and loss of about 100 acres of wetlands (and resulting creation more than an acre of mitigation), would also have been covered by the Friary Road route. Contractors will bill you that building in a floodplain, like the Standard, is generally far more expensive than on an existing street out of the floodplain — such as Friary Road.

Long before construction of the trolley, River Valley Preservation Project submitted a cost comparison to the Army Corps of Engineers and EPA, based on MTDB's own records showing how millions of dollars could be saved by a Friary Road route. We requested that those agencies require an independent contractor's analysis of this comparison. For some reason, those agencies did not require such a cost analysis.

Other fallout from the Standard trolley route, and course reconstruction includes the city being in trouble with FEMA for federal code violations such as building in a floodway without FEMA approval and causing

these in flood levels. Last November, Channel 39 reported that these violations were among the three worst in FEMA's western region, which includes hundreds of cities.

Though FEMA gave the city a Feb. 1 deadline to correct the violations, the city still has not done so. Last February, in case of flooding, there were 12 river rescues in Mission Valley. Lifeguards were gassed on Channel 8 regarding their observations that worsened flooding was a result of the recent development in the valley/floodplain.

Randy Berkman
River Valley Preservation Project
San Diego

NEWS

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P.1



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

March 26, 2002

S. Gail Goldberg, AICP
Planning Director
City of San Diego
Planning Department
202 "C" Street, MS 5A
San Diego, CA 92101-3865

RE: Comments on the City of Villages Growth Strategy – Strategic Framework Element Draft EIR

Dear Ms. Goldberg,

Hh-1

On behalf of San Diego Audubon Society's 3000 members, we would like to thank you for the opportunity to comment on the Environmental Impact Report for the City of Villages plan. San Diego Audubon Society's mission is to advocate for the appreciation and protection of birds and other wildlife and their habitat. In keeping with this goal our letter will focus mainly on biological issues. However, we would like to express one general and overarching concern – the lack of a comprehensive plan for the region. We feel very strongly that unless the growth strategies of all of the jurisdictions are coordinated, each is likely to fail despite its individual merits. For example, it is the desire of our organization, as well as the goal of several diverse coalitions, that development be located closer to existing infrastructure rather than sprawling into the backcountry. As the County updates its General Plan and works to transfer development away from its wild lands and closer to the west, it must coordinate with areas appropriate for receiving development. The City is one such area. The most significant problems are likely to occur if zoning is modified to match independent general plan updates without careful inter-jurisdictional coordination. In order for the City's Strategic Framework element to work we have to stop expanding our city's footprint and reduce the transportation requirements. The only way this can happen is in close consultation and coordination with the other jurisdictions in our region, namely the County.

STAFF RESPONSE Hh-1: Please see response to comments A-5 and A-37. Also see responses B-21 and B-64.

Hh-2

Specific Biological Concerns

If the City of Villages Strategy is implemented as planned it will concentrate growth near existing infrastructure. This would be a very positive outcome. However, it is important to point out that this will also have another likely consequence – more new development near already constrained river corridors, and near beaches. For this reason, we are concerned that while the EIR analyzes a range of impacts, it does not address impacts to biological resources. If the City of Villages results in a tendency to destroy, degrade, or cause edge effects to natural canyons, wetlands, waterways, or other areas with habitat or water quality value, a biological impact will occur. The biological impact could result from construction, fire clearance, clearance for crime prevention, park development, increased public access to sensitive habitat areas, construction or maintenance of infrastructure, etc. These impacts could be direct, indirect or cumulative. The EIR must identify and analyze these impacts and identify measures to avoid, minimize, and offset the remaining biological impacts.

STAFF RESPONSE Hh-2: Please see response to comments A-20, B-3 and D-4.

Hh-3

Page IV-67 suggests that urban runoff will enhance the intermittent waterways in our canyons into naturalized green riparian areas. It suggests this is a biological benefit. A broad diversity of wildlife thrives in these seasonally dry waterways. Converting these canyons to year round wet areas will exclude those native plants and animals. It should also be noted that year round water flow will dramatically increase the vulnerability of these canyons to invasive plants and animals. We urge that these impacts be evaluated in a chapter on Biological Impacts.

STAFF RESPONSE Hh-3: Please see response to comment B-85.



Hh-4

We are concerned that the water quality section lists degraded water bodies, Table G-1, and Canyons within the MHPA, Table G-3. The City is obligated to preserve wetlands inside and outside the MHPA by the Biological Mitigation Ordinance and the MSCP. Further the City is required to prevent pollution to all water bodies, whether or not they are listed as degraded water bodies. We urge that the EIR not suggest that impacts to areas outside of the MHPA or the Impaired Water Body List are not significant.

STAFF RESPONSE Hh-4: Please see response to comments A-21 and B-85. Also see response N-4.

Hh-5

In the final sentence on Page V-1, of the EIR is growth inducing. It says that the plan may potentially overburden public facilities and services. However the growth inducement will also tend to impact water quality, biological resources, air quality, etc. We urge that the next version of the EIR identify those impacts, if only at a high level.

STAFF RESPONSE Hh-5: Please see response to comment B-64.

Hh-6

On page VII-1, the EIR identifies Biological Resources as not suffering significant effects. There is no information given to substantiate that allegation. A fair argument can be made that this plan will have a potential impact on Biological Resources as we have stated in a previous paragraph. It is very likely that there will be a strong tendency to destroy wetlands, waterways, and sensitive habitat areas if they are near areas for which development is to be intensified. Even MHPA designation does not assure that a sensitive habitat area will not be developed. The MHPA boundary adjustment process has been used often to allow such development to take place. Therefore, impacts to Biological Resources must be analyzed as being potentially significant.

STAFF RESPONSE Hh-6: Please see response to comment A-20. Also see responses B-3, F-13 and Gg-30.

Hh-7

On Page VII the EIR states, "The proposed resultant intensification within the urbanized core, may lessen development pressures on dwindling vacant and/or sensitive areas." We hope that supposition will come true. However there is no certainty that City government will assume the responsibility to reduce outlying development to offset the proposed development within the urban core. Therefore that supposition does not preclude the need to analyze the potentially significant biological impacts of this plan in this EIR.

STAFF RESPONSE Hh-7: Please see response to comments B-37 and B-64.

Hh-8

If the City of Villages concept is implemented to the exclusion of continuing sprawl type development there will be significant beneficial environmental impacts in all categories. However, if we implement the City of Villages and continue sprawling, the infrastructure money will be split and totally inadequate. A full range of negative environmental impacts will result such as air quality, water quality, sewage spill, watershed value, habitat loss, open space loss, traffic, etc. It is not clear that a political body will demonstrate the needed level of responsibility. We urge that the EIR clearly identify the huge environmental impacts that are likely to occur if this project is implemented along with continued sprawl.

STAFF RESPONSE Hh-8: Please see response to comments B-37 and B-64.

Sincerely,


Allison Rolfe
Conservation Program Director


James Peugh
Conservation Chair



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CITY OF SAN DIEGO
MAR 26 2002
PLANNING DEPARTMENT

March 21, 2002

Anne Lowry, Senior Planner
Environmental Analysis Section/Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

RE: DRAFT ENVIRONMENTAL IMPACT REPORT
CITY OF VILLAGES GROWTH STRATEGY – STRATEGIC FRAMEWORK ELEMENT
LDR No. 40-1027; SCH No. 2001061069

Ii-1 The City of Villages Growth Strategy is designed to accommodate the projected population growth of the City for the year 2020 and beyond. Since the remaining vacant land available for development is less than 10% of the total City's 331 square miles, the Growth Strategy provides a plan for densification of already developed areas through redevelopment and infill. The City of Villages is designed to increase residential uses in mixed use buildings located at a village center that also provides commercial and retail places and public meeting spaces. This type of development is designed to also provide public transit stops in the village centers plus pedestrian friendly communities both in the village centers and in the outlying single detached home areas. This type of Transit Oriented Development is consistent with the Sierra Club Anti-Sprawl Campaign. It is also consistent with the way that the City has naturally developed; in fact, many of our city neighborhoods already serve as city villages.

STAFF RESPONSE Ii-1: Comment duly noted.

Ii-2 This is a Programmatic EIR that will be followed by more specific environmental documents as implementation of the plan proceeds. Members of the San Diego Chapter of the Sierra Club have reviewed this DEIR and have the following comments to make.

STAFF RESPONSE Ii-2: Comment noted.

LAND USE

Ii-3 Land Use would be subject to the environmental goals of current community, specific, subarea, and park plans, including the Multiple Species Conservation Plan (MSCP). Since these plans address habitat, wildlife, natural open space, and natural drainage, the DEIR states that there will be no significant impacts on these resources from implementation of the Plan.

STAFF RESPONSE Ii-3: The commenter is correct in interpreting the distributed DEIR determinations regarding land use.

Ii-4 However, it is our opinion that although the plans referred to include protections for environmental impacts, there are areas in the City where current plans are inadequate to meet the anticipated pressures of increased population densities. For example, there are a number of open space areas in the City that are unsuitable for development due to environmental constraints. Some of these areas are not covered by the MSCP, nor are they included in any other park system of the city. Many of them are in the urban canyons and are subject to uses that destroy the native vegetation and animals that inhabit them. The increased development and population pressures resulting from the addition of 17,000 to 37,000 attached homes indicates a need for increased protection for these areas. Although the current *Progress Guide and General Plan* prohibits development of floodplains, steep slopes, canyons, coastal and waterfront lands, and prohibits filling of canyons, and requires conservation of endangered species, there is no provision for the active management and monitoring of natural open space areas, nor for restoration of areas damaged by improper uses and by the invasion of exotic species. Such protections should be added to the Programmatic EIR both as mitigation for the environmental impacts of the increased population densities proposed and to provide the needed natural open space areas for passive recreational uses for these populations. Specific procedures to provide protections for

STAFF RESPONSE Ii-4: Refer to previous Staff Response A-24. It should be noted that the distributed DEIR disclosed an opportunity for certain urban canyons to be enhanced in conjunction with pipeline repair, replacement, or maintenance; these enhanced canyons could serve as visual open space, provide passive water quality control, and, where appropriate, could include passive recreation of foot trails. The mitigation from the capital improvement projects can be used in-situ to remove exotics, revegetate with native plants, and assure the initial planting success.

neighborhood open spaces and parks should be added to the specific projects as they are planned. This provision for protection of open space should be added as a specific finding to be put into an implementing ordinance in the zoning code.

Ii-5 Most Community Plans contain strong language protecting from development the steep hillsides that provide view corridors and habitat, and flank open space. The DEIR states that, because the City is almost built out, language in Community Plans that protect hillsides from development is moot. This is not true. Hillsides in the built-out urban environment continue to require strong protection from development.

Ii-6 These hillsides are being destroyed for two reasons:
1. Illegal development and grading by adjacent landowner; protective regulations already in place are enforced only haphazardly because of lack of resources in the Neighborhood Code Compliance division.

Ii-7 2. The current Land Use Code gives protection only for "natural" hillsides. The Development Services department has chosen to interpret this as meaning that any land on which soil is disturbed, even incidentally, as a result of adjacent or on-site development is considered not natural. Also, steep slopes that have been invaded by exotic plant species are considered not natural. This interpretation is not supported by the current Progress Guide and General Plan, which says "Prohibit development of floodplains, steep slopes, canyons, coastal and waterfront lands...."

Ii-8 In addition, the habitat in our canyons will need an increased level of management, in order to restrain the urban boundary and prevent destructive use and weed encroachment. Destruction of our hillsides will only increase as a result on increased density. The Strategic Framework must describe how the City will deal with these issues. Requirements for strict observation of current regulations protecting open space and for the protection of hillsides need to be included as specific findings in the City's implementing ordinance in the zoning code.

Ii-9 Protection of natural landforms is critical to the proposed Urban Form of the City of Villages and is addressed in this document in the section *Hillside and Sensitive Lands Development*. An important aspect of natural landforms is the naturally occurring ridgelines. Although there are not many of these remaining, it should be a primary goal of the Programmatic EIR to ensure that all development plans include protection for natural ridgelines, by prohibiting grading or development directly on a ridgeline as this defeats the stated goal of the Plan to conserve and enhance natural landforms of the City. Where possible, destroyed ridgelines should be restored.

Ii-10 In this same section, community plans should be encouraged to add further provisions for the protection of sensitive habitat by requirements for reduced outdoor lighting and limited noise production in areas adjacent to sensitive habitats, such as is required by the MSCP.

Ii-11 In order to strengthen the document's compliance with the environmental policies of the City, the communities, and land use plans, we recommend changing the statement under *Hillside and Sensitive Lands (IV-4)*, from "2. Minimize or eliminate development impacts on rare, threatened, endangered, or candidate species", to: "Eliminate development impacts on rare, threatened, endangered, or candidate species." Additionally, where emphasis is placed on adherence with the Multiple Habitat Conservation Plan, the phrase "Other Community Open Space" should be included to clarify the fact that such open spaces exist and are protected by open space regulations. During the 1997 City Council hearings on the MSCP, the amendments to the *Progress Guide and General Plan* were approved by the environmental community and many community planning boards only on the condition that certain open space specific to communities continue to be protected as "Other Community Open Space." Therefore, the two primary categories of "Open Space" in the amended *Progress Guide and General Plan* are "MSCP Open Space" and "Other Community Open Space." In reference to Other Community Open Space, the final EIR should quote directly from the *PG & GP*:

STAFF RESPONSE II-5: Comment noted. The distributed DEIR was referring to past development on large acreage which utilized mass grading to flatten ridgetops, fill drainages, and create large manufactured slopes. The commenter is correct in asserting that there are potential damaging projects on a smaller scale.

STAFF RESPONSE II-6: Comments noted. There are documented incursion of private homeowner encroachments into public open space areas; however, it should be noted that code enforcement actions have been taken on homeowners who have encroached on City-owned open space and onto dedicated open space easements.

STAFF RESPONSE II-7: Comments noted. From a CEQA analysis standpoint, most impacts on manufactured slopes or slopes covered with exotics are not significant. An exception to this is the situation where natural slopes have been illegally graded or brushed. In these cases, the owner must obtain a permit and restore or mitigate the loss of the natural vegetation. This situation occurs either as a code violation or as part of a discretionary permit review.

STAFF RESPONSE II-8: Comments noted. Adherence to established regulations is assumed; a more effective approach is to tighten up the regulations such any loopholes are closed and interpretations contrary to the intended protection of resources are difficult to make.

STAFF RESPONSE II-9: Refer to previous Staff Response Ii-5. It should be noted that an EIR is not the proper vehicle to "ensure that all development plans include protection for natural ridgelines". The purpose of an EIR is to disclose impacts and to require mitigation for unavoidable, significant impacts. Also refer to previous Staff Response Ii-8.

STAFF RESPONSE II-10: The commenter's cited protection of the MHPA is already expressed in the MSCP. Subarea Plan, specifically, in the Adjacency Guidelines.

STAFF RESPONSE II-11: Refer to previous Staff Responses A-21 and A-24.

"This category includes areas that have been designated for long-term open space use primarily because of their value in protecting landforms; providing buffers within and between communities or potentially incompatible land uses; providing visually appealing open spaces; and protecting habitat and biological systems of community importance that are not otherwise included in the (MSCP) Open Space category. Most of this open space has been designated in adopted land use plans for many years..."

Ii-12

In the same Section, under the heading *Parking*, it is stated that most community plans prohibit the elimination of existing parking. This requirement should be amended since one of the major goals of the City of Villages Plan is decreased dependence on private automobiles. Such decreased dependence should lead to a decreased need for parking spaces, so that the elimination of parking areas should be encouraged, not discouraged. Parking structures that reduce the land area needed for parking should be encouraged while those parking areas that remain should be surfaced in permeable materials to enhance the retention of rainwater as described below. The use of extensive land areas for parking should also be discouraged in a city that is becoming limited by the lack of land for residential and commercial uses.

AFFORDABLE HOUSING

Ii-13

The stated goal of the City of Villages is to accommodate all economic levels of housing. The population growth that the City is projected to experience over the next 20 years must include some provisions for affordable housing. The Sierra Club strongly supports governmental requirements for provision of affordable housing and encourages the City to adopt some type of inclusionary housing provision. It is well known that most residential developers need encouragement to provide such housing and inclusionary housing regulations are most effective in meeting the goals for affordable housing. Inclusionary housing regulations are already operating in the North City Future Urbanizing Area (NCFUA), where The Framework Plan from August 1992 includes in Section 7, page 70, Affordable Housing and Housing for Persons with Special Needs, a requirement for the inclusion of housing affordable to all income levels in all developments in the NCFUA. We strongly encourage the City to provide such regulations for the entire city so that the overwhelming need for housing for the entire economic range of city dwellers is met.

STAFF RESPONSE Ii-12: Comments duly noted.

STAFF RESPONSE Ii-13: Comments duly noted.

SIGNIFICANCE OF IMPACTS

Ii-14

The DEIR states that the new growth policy proposed by the Strategic Framework would not create a significant land use impact if the intent of current community, specific, subarea, park, and MSCP plans are followed. However, we believe that there will be significant impacts due to the proposed increased densification, mainly because of the increased stress on current infrastructure. The changes in land uses to accommodate new mixed use residential, commercial and industrial development as well as new schools, libraries and other public buildings, will require strong protections for the parks and natural open spaces we now have as well as creation of new parks and open spaces and restoration of damaged areas to meet the needs of the increased population. One example of poorly designed "smart growth" is the UTC area along La Jolla Drive. In this densely populated area, which is also full of commercial and office spaces, there are few public parks. There is a public park off of Regents, south of Nobel, that was built to serve the needs of the area years ago. However, this one park is completely inadequate for the needs of the rapidly increasing population and no new parks have been built. Up to a year ago there was a pretty little grass lawn area about 10 yards square with painted white rocks at the north end of Towne Center Drive. People were able to look out to the ocean at north Torrey Pines. But this park was removed with one of the development projects. Now there is no space left for parks to accommodate the several thousand new units built in the area, as well as the many people working in the area who would appreciate a park for their lunchtime relaxation. This type of thoughtless destruction of local parks and recreational areas indicates the need to add specific findings and requirements in the implementing ordinances in the zoning code to preserve and expand local park space when new development is under consideration for an area.

STAFF RESPONSE Ii-14: Comments duly noted. It should be noted that there is an extensive designated MHPA area just to the east of UTC area which includes the Rose Creek drainage which is linked to San Clemente Canyon.

TRANSPORTATION

Ii-15 The City of Villages is designed to reduce dependency on the automobile through improved public transit, bicycle trails and pedestrian walkways. There are many ways to reduce dependence on the automobile but the least expensive, and most effective way would be to make walking in the city a safe and comfortable activity. This is not true today. Even in new neighborhoods, people are asked to walk and bicycle along high-speed roadways where cars exceeding speeds of 50 mph are not separated from the bicyclists and pedestrians except for a curb. Large streets are difficult for pedestrians to cross; it is impossible to get to retail shops without crossing a parking lot that has no provisions for pedestrians anywhere in sight.

Ii-16 A needed restoration project that should accompany the City of Villages development is the elimination of the many pedestrian unfriendly areas in the city. Creating pedestrian friendly areas should be a major goal of the city as well as a requirement for every development, redevelopment, and Infill project. Specific plans for achieving a city that is more pedestrian and bicycle friendly should be included in the final EIR. For example, with bicycles, we need more of a separation than a thick white line. Solid berms like those on Friars Road provide much more of a safety margin for bicyclists and pedestrians. Bikes need to be able to trigger traffic lights without pulling over to the sidewalk. They need plentiful parking structures that allow locking up bikes. For pedestrians, what ARE the ways that streets such as El Cajon Blvd. can be made more "user friendly" to walk along and to cross? Median beautification is one step; what else do they have in mind?

Ii-17 In the Section Community Plans – Environmental Goals and Policies (IV-2) there is a discussion of the Circulation/Transportation Elements of community plans. Most plans encourage improved public transit service. However, there is no reference in this section to funding for public transit. It is our view that new development should be required to provide financial support for the development of public transit to meet the needs of the introduced populations. Such a proposed development impact fee is consistent with the current fees that are assessed to provide financing for highway and street improvements, and will serve the same function, i.e., providing optional mobility for the populations that will be introduced into a neighborhood. In addition the City should actively seek to PROVIDE matching funds, and FIND matching funds from state and federal sources to supplement developer contributions, such as might be found in smart growth incentive programs coming from the State.

Ii-18 Since the success of the City of Villages is strongly dependent on a viable and publicly acceptable plan to improve public transit and reduce reliance on automobile trips, the City should introduce legislation concurrently with the adoption of the City of Villages Plan to show where funding of public transit will come from. In addition to contributions from developers and possible matching funds from state and federal governments mentioned above, the city should pursue a greater percentage of funds for public transit from other avenues as well, such as within TRANSNET reauthorization. The Sierra Club supports efficient use of our transit dollars, as we believe this is paramount toward achieving alternatives to the single occupant vehicle. One of the most effective ways that we can improve our public transit system and reduce automobile dependence is the proposed express bus option using the trolley car design (sometimes referred to as flex-trolley), which has built in efficiency and quality of service advantages that should be aggressively explored.

Ii-19 NOISE
On page 57, Section IV F.NOISE identifies several streets that will be negatively affected by increased noise resulting from denser development. This section is deficient in two aspects.
1. The DEIR identifies only potential "Corridors" as areas affected by increased noise. It does not identify other areas that will be negatively affected by noise from increased auto traffic near Village areas. In the TRANSPORTATION section, the DEIR admits that use of the automobile will decrease only 6%, even if the transit system is built as planned. Densification of urban areas will lead to more auto travel on the streets in the vicinity of

STAFF RESPONSE Ii-15: Comments duly noted. The proposed Strategic Framework Element contains policies which increase walking opportunities. These policies include promoting streetscape, a walkable, interconnected street network, and street trees. In addition, the revised Traffic Manual will include traffic calming measures.

STAFF RESPONSE Ii-16: Comments duly noted. Besides a wider median for safe crossing of wide roadways, traffic lanes could be made narrower to slow vehicles and crosswalks could be raised for better visibility and demarcation of pedestrian crossing.

STAFF RESPONSE Ii-17: Comments duly noted. It is hoped that for initial demonstration of the proposed pilot villages that state and federal funds/grants may be obtained to implement design features that encourage transit ridership, bicycling, and walking. Transit and bicycling have been a part of the regional air quality strategy for over twenty years; with the addition of long-missing land use component, these measures may actually have a chance to make a significant difference in reducing vehicle trips.

STAFF RESPONSE Ii-18: Comments duly noted.

STAFF RESPONSE Ii-19: It should be noted that the cited six percent has been revised to 9% to 10% of the total trips attributable to transit ridership, walking, and bicycling.

The noise impact from the potential villages were not addressed because this proposed strategy to guide future growth and development, would not directly result in any land use change or specify any potential village location. Without this specificity it is difficult to analyze noise impacts posed by the future implementation of the proposed strategy. It should be noted that a noticeable noise increase of 3dB requires the traffic volume to double; there are no areas in the City even with potential village development and growth to the year 2020, which would even approach doubling of the current traffic levels.

the densified areas. For example, it is very likely that, if the density at 30th and University is increased, then traffic will significantly increase on 30th and Utah Street, as people drive between the Villages and jobs downtown. Utah Street is lined with single-family and small-multi family residential development. This impact is not discussed in the NOISE section.

- Ii-20 | 2. The mitigation measures described only apply to new development. There is no mitigation for existing residences that will be subjected to increased noise. Therefore, NOISE must be considered SIGNIFICANT and UNMITIGATABLE.

STORM WATERWATER QUALITY

- Ii-21 | The current *Progress Guide and General Plan* requires increased utilization of local water resources. The City of Villages Plan will create increased pressure on the need for increased stormwater purification procedures and specific methods for achieving adequate purification should be included in the Programmatic EIR and added as findings to be put in the implementing ordinance in the zoning code. In addition, provision for funding inspection and maintenance of the stormwater purification devices should be included in the developers' fee schedules.

WATER RESOURCES AND CONSERVATION

- Ii-22 | Specific methods for retaining rainwater, such as a reduction in non-permeable surfaces throughout the city, should also be added as specific findings to be put into an implementing ordinance in the zoning code. As an example, rainwater retention can be improved through the use of permeable materials that are now available for hard surfaces such as parking lots, and driveways. General descriptions of approved water retention methods that could be adopted in the development, redevelopment and infill plans should also be included in the Programmatic EIR.

Sincerely,

Janet A. Anderson

Janet A. Anderson
Chair, Smart Growth Task Force

Contributors include: Eric Bowby, Carolyn Chase, Jan Fuchs, Fred Lorenzen, David Morrison, Bryan O'Leary, and Carrie Schneider

STAFF RESPONSE Ii-20: Refer to previous Staff Response Ii-19. The stated noticeable noise increase of 3dB is also the significance threshold. As stated previously in a developed urban area, doubling of traffic or other noise sources is highly unlikely.

STAFF RESPONSE Ii-21: The distributed DEIR disclosed all new developments which would be required to comply with the new regulations. In addition, it was disclosed that runoff from underground garages or parking structures are connected to the wastewater system for treatment. This scenario is highly likely for potential village-type development such that this active treatment would be better than the passive controls required for open large lots such as permeable surfaces or grass-lined swales. The City's Development Services Department is implementing a process to plan check required stormwater controls.

STAFF RESPONSE Ii-22: It should be noted that soils in the City are generally made of clay and is naturally impermeable. This is evidenced by the vernal pool-mima mound topography which once occurred on most mesa top areas in San Diego. These soils also prevent groundwater recharge; the exception are the loose, sandy soils found in the river valleys and the larger creek drainages which are highly permeable.



NATIONAL WILDLIFE FEDERATION*

People and Nature: Our Future Is in the Balance

Western Natural Resource Center

March 26, 2002

FAXED
3-26-02

CITY OF SAN DIEGO
APR 02 2002
PLANNING DEPARTMENT

Ms. Anne Lowry
Senior Planner
Environmental Analysis Section
City of San Diego
City Development Services Department
1222 First Avenue
Mail Station 501
San Diego, CA 92101

RE: Comments on the City of Villages Growth Strategy -- Strategic Framework
Element Draft EIR

Dear Ms. Lowry:

On behalf of the National Wildlife Federation's approximately 12,000 members in San Diego, we would like to thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Villages plan.

Jj-1

While the National Wildlife Federation's work revolves around the protection of wildlife and wildlife habitat, our mantra is "People and Nature: Our Future is in the Balance." With that said, in general, we are supportive of the City of Villages concept, as we believe it strives towards achieving that delicate, but important balance between people and nature. However, we do have some concerns about the current proposed plan.

Jj-2

Our overarching concern about the City of Villages program is the lack of a comprehensive plan for the region. We feel very strongly that unless the growth strategies of all of the jurisdictions are coordinated, each is likely to fail despite its individual merits. For example, it is the desire of our organization, as well as the goal of several diverse coalitions, that development be located closer to existing infrastructure rather than sprawling into the backcountry. As the County updates its General Plan and works to transfer development away from its wild lands and closer to the west, it must coordinate with areas appropriate for receiving development (i.e. the City). Moreover, while SANDAG has announced the commencement of a new Regional Plan, to date it lacks a specific vision that will link all of these processes — including City of Villages — together in a comprehensive fashion.

Jj-3

The land use decisions made by the City of San Diego are critical for all of the other pieces of the puzzle to fit. The most significant problems are likely to occur if zoning is modified to match independent general plan updates without

STAFF RESPONSE Jj-1: Comments duly noted.

STAFF RESPONSE Jj-2: Comments noted. The City of San Diego has taken the lead in the region to attempt to apply Smart Growth principles. With 40% of the population and 60% of the jobs in the region, the City hopes that this lead effort would as a minimum would set the example for the southwestern portion of San Diego County and that along with the County, City of Chula Vista and SANDAG can work cooperatively to comprehensively plan this subregion.

STAFF RESPONSE Jj-3: Comments noted. The desired result is a seamless plan with the County and Chula Vista. As disclosed in the distributed DEIR, these three jurisdictions have experience cooperatively working together in the MSCP and regional park planning efforts..

Careful inter-jurisdictional coordination. In order for the City's Strategic Framework element to work, we have to stop expanding the City's footprint and improve the region's transportation network, especially mass transit elements. The only way this can happen is in close consultation and coordination with the other jurisdictions in our region, namely the County and SANDAG.

Specific Biological Concerns

Jj-4 If the City of Villages Strategy is implemented as planned it will concentrate growth near existing infrastructure. This would be a very positive outcome and is indeed a tenet of "smart growth." However, it is important to point out that this will also have another likely consequence – more new development near already constrained river corridors, and near beaches. For this reason, we are concerned that while the DEIR analyzes a range of impacts, it does not adequately address impacts to biological resources. If the City of Villages results in a tendency to destroy, degrade, or cause edge effects to natural canyons, wetlands, waterways, or other areas with habitat or water quality value, a biological impact will occur. The biological impact could result from construction, fire clearance, clearance for crime prevention, park development, increased public access to sensitive habitat areas, construction or maintenance of infrastructure, etc. These impacts could be direct, indirect or cumulative. The DEIR must identify and analyze these impacts and identify measures to avoid, minimize, and offset the remaining biological impacts.

Jj-5 Page IV-67 suggests that urban runoff will enhance the intermittent waterways in our canyons into naturalized green riparian areas. It suggests this is a biological benefit. A broad diversity of wildlife thrives in these seasonally dry waterways. Converting these canyons to year round wet areas will exclude those native plants and animals. It should also be noted that year round water flow will dramatically increase the vulnerability of these canyons to invasive plants and animals. We urge that these impacts be evaluated in a chapter on Biological impacts.

Jj-6 We are concerned that the water quality section lists degraded water bodies, Table G-1, and Canyons within the MHPA, Table G-3. The City is obligated to preserve wetlands inside and outside the MHPA by the Biological Mitigation Ordinance and the MSCP. Further, the City is required to prevent pollution to all water bodies, whether or not they are listed as degraded water bodies. We urge that the Final EIR not suggest that impacts are not significant to areas outside of the MHPA or the Impaired Water Body List.

Jj-7 The final sentence of Page V-1 states that the City of Villages will indeed be growth inducing and "may potentially overburden public facilities and services." However, we believe that it should also acknowledge that this growth inducement would also impact water quality, biological resources, air quality, etc. We urge that the next version of the DEIR identify and assess those impacts.

STAFF RESPONSE Jj-4: Refer to previous Staff Response B-3 (Paragraph 2).

STAFF RESPONSE Jj-5: As disclosed in the distributed DEIR, all urban canyons have storm drain outlets; so the persistent urban runoff into some of these canyons occur year round. Select urban canyons with riparian exotics such as arundo are prime targets for the suggested enhancement. In addition most urban canyon in the long-established neighborhoods also contain aging sewer pipelines which need to be replaced, repaired or maintained. The impact from these infrastructure improvement can be mitigated in situ to start the revegetation with native species. Once established, the runoff fed riparian areas would provide habitat, visual green space, and passive water quality control. While it is true that some canyons have seasonal flows only and much of the native vegetation is upland species, the presence of water with riparian plants adjacent to uplands is a unique combination of habitats in the region.

STAFF RESPONSE Jj-6: Comment noted. Refer to previous Staff Response Jj-5.

STAFF RESPONSE Jj-7: The distributed DEIR addressed water quality and determined that the proposed City of Villages strategy would not pose a significant impact. It addressed impacts to air quality and determined that the project may contribute to a significant condition; therefore, air quality impacts were determined to be significant and unmitigated. Also refer to previous Staff Response B-3 regarding biological resources.

Jj-8 On page VII-1, the DEIR identifies effects on Biological Resources as "not significant. There is no information provided, however, to substantiate that statement. A fair argument can be made that this plan will have a potential impact on Biological Resources as we have stated above. It is very likely that there will be a strong tendency to destroy wetlands, waterways, and sensitive habitat areas if they are near areas for which development is to be intensified. Even MHPA designation does not assure that a sensitive habitat area will not be developed.

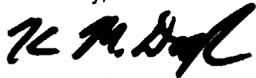
Jj-9 The MHPA boundary adjustment process has been used often to allow such development to take place. Therefore, impacts to Biological Resources must be analyzed as being potentially significant.

Jj-10 On Page VII the DEIR states, "(t)he proposed resultant intensification within the urbanized core, may lessen development pressures on dwindling vacant and/or sensitive areas." We hope that this vision will come true. However, there is no certainty that City government will assume the responsibility to reduce outlying development to offset the proposed development within the urban core. Therefore, that supposition does not preclude the need to analyze the potentially significant biological impacts of the plan in the DEIR.

Jj-11 If the City of Villages concept is implemented to the exclusion of continuing sprawl type development, there will be significant beneficial environmental impacts in all categories. However, if we implement the City of Villages and continue to sprawl, the infrastructure money will be split and totally inadequate. A full range of negative environmental impacts will result such as air quality, water quality, habitat loss, open space loss, traffic, etc. It is not clear that a political body will demonstrate the needed level of responsibility. We urge that the DEIR clearly identify the huge environmental impacts that are likely to occur if this project is implemented along with continued sprawl.

We look forward to working with the City to achieve a City of Villages that will help move the San Diego region towards sustainability.

Sincerely,



Kevin M. Doyle
Director of Habitat Conservation Programs

STAFF RESPONSE Jj-8: As stated in the distributed DEIR most potential villages would be located in developed commercial areas along major roads. There would be no adverse effects to biological resources. Also refer to previous Staff Response B-3.

STAFF RESPONSE Jj-9: MHPA boundary line adjustment occurs for development which are adjoining the current MHPA boundary; most potential village sites are nowhere near the MHPA and are not candidates for boundary line adjustment. The proposed strategy does not designate any village location; this current process is twice removed from any on-the-ground development. Also refer to previous Staff Response B-3.

STAFF RESPONSE Jj-10: Refer to previous Staff Responses Jj-9 and B-3.

STAFF RESPONSE Jj-11: The distributed DEIR considered impacts of continued growth as well as those from the proposed additional attached units which ultimately could be allowed by the proposed City of Villages strategy in the year 2020. Refer to Staff Responses Qq-3 and Qq-4.



COMMENT LETTER on CITY OF VILLAGES DRAFT EIR

Mr. Larry Monserrate, Assistant Deputy Director
Development Services Department
Land Development Review Division
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

CITY OF SAN DIEGO
Construction Services
MAR 25 2002
PLANNING DEPARTMENT

RE: DRAFT EIR FOR THE CITY OF VILLAGES GROWTH STRATEGY -
STRATEGIC FRAMEWORK ELEMENT
LDR No. 40-1027 SCH No. 2001061069

Dear Mr. Monseratte:

Kk-1 | The Catholic Diocese of San Diego wishes to raise several issues in regard to the draft EIR for the City of Villages Growth Strategy, particularly as it relates to the proposed development of the St Jerome Catholic Church campus in Otay Mesa.

The site on which the St Jerome church campus is proposed is shown on Figure 2, *Strategic Framework Element City of Villages Map*, with the legend, "Urban and Neighborhood Villages Centers and Transit Corridors."

Contradictory Information and De Facto Rezoning

Kk-2 | Throughout the DEIR, there is reference to application of the Transit Oriented Development (TOD) Guidelines as an overlay for each proposed village center as "an interim measure until community plans [are] amended with associated design standards to implement the proposal." (See DEIR Conclusions, p.i for the first such reference in the document.)

Kk-3 | Inherent in this approach is an assumption that each community will concur with the City of Villages program, support the City of Village designation as applied by City staff, and agree to amend their community plan. After all, why apply the TOD overlay – which effectively reserves a site for a village – unless there is a foregone conclusion that the site will be acceptable to the local community?

Kk-4 | We believe some communities *will not* support the village designation shown on the City's map. In the case of Otay Mesa, City staff indicates that the St Jerome Church campus *is incompatible* with a village. However, the Otay Mesa Community Planning Group unanimously supported initiation of a community plan amendment to permit development of the St Jerome Church campus. Based on

STAFF RESPONSE Kk-1: Comments noted. It should be noted that the "town center" site which includes the church and school proposal has been removed from the draft City of Villages map. This removal for any future consideration was in response to this comment letter which suggests that there may be vernal pools on the proposed church/school site. Aerial photographs indicated disturbed mima mound topography on this site; these are prime indicators of vernal pools. The City values these rare, vanishing micro-habitat. The removal of the site north of Otay Mesa Road is to avoid any potentially significant impact of resulting from conceptually intensifying the land use on a site with potential vernal pools. This rare habitat was not covered by the City's MSCP effort and may contain several endangered plants and animals; this is the rarest habitat in the City. Any effect direct or indirect would be a significant impact needing mitigation; mitigation is often difficult whether one buys offsite mitigation sites or establishes new pools elsewhere. Often times the off-site mitigation for vernal pools must be determined to be successful before the on-site pools are disturbed.

STAFF RESPONSE Kk-2: The TOD guidelines apply only to discretionary projects and require certain transit design features; these guidelines do not affect the existing change use or zoning.

STAFF RESPONSE Kk-3: Most villages are located along major streets which easily could be future transit corridors if they are not one already; therefore, whether these area become villages with subsequent community plan updates or amendments, it make good planning sense to require that transit oriented design be incorporated into new projects which need discretionary approvals.

STAFF RESPONSE Kk-4: Comments noted; these comments do not address the adequacy of the EIR or its determinations.

City staff beliefs regarding the incompatibility between a church and a village, AND the actions taken by the Otay Mesa Community Planning Group, there is certainly a suggestion that the Planning Group cannot support a village on the designated site. Thus there is an inconsistency in the selection of this particular site.

Kk-5 | Moreover, consider that there does not presently exist a TOD overlay zone in the City's Land Development Code. Are we to thus assume that the TOD Guidelines themselves are applied to each and every site designated on Figure 2, *Strategic Framework Element City of Villages Map*?

Kk-6 | If that's the case, it means that 91 pages of policy and very explicit design requirements are de facto imposed on hundreds if not thousands of acres of property in San Diego. We see no discussion nor analysis of this impact in the DEIR, which is tantamount to changing all community plans in the City or, at the very least, casting a shadow on them concerning what uses and standards govern development within the village-designated area.

Inadequate Environmental Analysis

Kk-7 | We believe the City has erred in locating a neighborhood village on and around the Town Center site, as shown in the Otay Mesa Community Plan, for environmental reasons.

Kk-8 | In the staff report prepared regarding the initiation of the Otay Mesa Community Plan amendment for the St Jerome Church Campus, City staff states that topics to be addressed include environmental issues such as "vernal pools, Quino Checkerspot, and Otay Mesa Tarplant, and other sensitive species." (P.4, Report No. P-02-016, dated January 17, 2002)

Kk-9 | If these environmental conditions are known to exist on or near the site, then how can the City designate a village there? Or, if there is an assumption that these conditions can be mitigated, we would expect to see a mitigation program. As you know, no mitigation program has been established.

Kk-10 | We believe that the issues raised herein have not been adequately addressed in the DEIR.

Very truly yours,
CATHOLIC DIOCESE OF SAN DIEGO


Wm. Joel King, AIA
Director, Construction Services

March 18, 2002

STAFF RESPONSE Kk-5: The TOD Design Guidelines were adopted by the City Council in August 1992. As stated previously the TOD guidelines will be placed on areas needing a discretionary approval.

STAFF RESPONSE Kk-6: These guidelines are imposed only if the development requires a discretionary approval; most discretionary approvals need to demonstrate some sort of benefit to the community. The proposed City of Villages strategy does not result in any land use change.

STAFF RESPONSE Kk-7: Refer to previous Staff Response Kk-1.

STAFF RESPONSE Kk-8: The commenter cites sensitive/endangered species which require unique stewardship. The vernal pool is such a rare and sensitive habitat that just the conceptual idea of ultimately intensifying the land use in an area where they are suspected to be can be considered a significant impact. In addition it is difficult to incorporate into any development design; it requires protection of the watershed and a buffer around the watershed. While the actual pool may be twenty feet across, the required protection area may quite easily radiate 100 feet out from the actual pool. The presence of endangered butterfly is another formidable hurdle for development if present or suspected; this endangered species was not a covered species in the adopted MSCP. For these reasons and to avoid complications, the town center site has been dropped as a potential village site.

STAFF RESPONSE Kk-9: Refer to previous Staff Responses Kk-1 and Kk-8.

STAFF RESPONSE Kk-10: We appreciate the commenter bringing this to our attention. These sensitive, endangered species were not indicated on our resources maps, but now that the commenter made us aware of their possible presence, we have avoided any direct or indirect adverse effect by removing the potential village site from future consideration for any land use intensification.



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

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3/26/02

CITY OF SAN DIEGO

MAR 29 2002

COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) PLANNING DEPARTMENT
City Of Villages Growth Strategy-
Strategic Framework Element

SUMMARY OF COMMENTS

- LI-1 1. Utopia or gridlock. The City of Villages strategy has positive elements, including the prospect of pedestrian-oriented community centers and improved mass transit. However, the positive elements may be outweighed by a flawed reliance on accommodating questionable forecasts of growth. For example, the focus on meeting numerical quotas for dwellings has led to the idiotic proposal, in this DEIR, of using urban canyons to satisfy the need for new parks.
- LI-2 2. Laudable goals, no mechanism. The strategy calls for in-fill development that is more compact than previous patterns and preserves open space, but is completely lacking in a mechanism to link urban densification with the preservation of suburban and rural areas. The strategy does not relocate any density. It adds development rather than relocates it from less suitable areas.
- LI-3 3. Alternatives poorly examined. The analysis of alternatives is totally inadequate and does not meet CEQA standards.
- LI-4 4. Unmitigated impact unacceptable. The reported unmitigated impacts, if allowed to occur, would create a breach of trust between the citizens and City government. The City leaders have said that new development would be allowed only if it maintained or improved the quality of life. Unmitigated impacts on traffic, air quality, and parks, among others, clearly degrade the quality of life.
- LI-5 5. Inducing growth. The citizen's committee that formulated the strategy stated clearly that growth was not to be encouraged or increased, but that growth was merely to be focused into more suitable areas. The Notice of Preparation stated "This strategy is designed to focus growth when and if it occurs". These objectives cannot be reconciled with the growth-inducing aspects described in the DEIR.

STAFF RESPONSE LI-1: The commenter's cited "using urban canyons to satisfy the need for new parks" is incorrect. The distributed DEIR disclosed that the current Progress Guide and General Plan allows flexibility to provide additional park staff and facilities to existing parks and recreation centers where new parkland is difficult to acquire. In addition, the DEIR disclosed an opportunity for certain urban canyons to be enhanced in conjunction with pipeline repair, replacement, or maintenance; these enhanced canyons could serve as visual open space and, where appropriate, could include passive recreation of foot trails. The Final EIR also includes the provision to acquire new parkland to satisfy existing and future recreational needs at a rate of 1.5 to 2.8 acres per 1,000 persons (in attached homes).

STAFF RESPONSE LI-2: The commenter is correct. The marketability and attractiveness of the mixed use attached residential units in compact villages with amenities, shops, employment, walkability, and readily available, convenient connections to an expanded transit system, is expected to lure some residents to the urban core areas. The persistent preference for large-lot, detached homes is recognized. However, there is also a recognized need for affordable rental units and entry-level, attached homes.

STAFF RESPONSE LI-3: Refer to previous Staff Response B-87.

STAFF RESPONSE LI-4: While the distributed DEIR determined that impacts to freeway traffic congestion and air quality is significant and unmitigated, it should be noted that air quality in the San Diego region has steadily improved since the adoption of the federal Clean Air Act and freeway congestion is expected to steadily become improved to the year 2020. It is incorrect to relate the DEIR conclusions to an asserted degrading of the quality of life. The DEIR determined that significant impacts to recreation can creatively be mitigated through a combination of improved facilities, enhanced open space with passive recreation, public open space, and some new parkland acquisition.

STAFF RESPONSE LI-5: The distributed DEIR determined that the proposed City of Villages could ultimately result in 17,000 to 37,000 additional, attached units within the City and that this increase would be growth inducing; this was a CEQA determination. A more regional view of this impact would be that the City's proposed strategy would attract new residents from surrounding jurisdictions and that regionally there would not be a net effect. However, within the City's jurisdiction where the City has complete land use control and is the CEQA Lead Agency, the proposed strategy would subsequently adjust the community plans to accommodate this new growth and ultimately attract growth into the City's jurisdiction; therefore, within the area under the purview of City, the proposed strategy must be considered growth inducing.

- LI-6 6. Housing needs. The needs of low and moderate income residents could be met by making sure that a meaningful proportion of new housing is affordable to low and moderate income households. This could be accomplished with a policy that mandated 20% inclusionary zoning plus more substantial linkage fees for industrial development. Sheer numbers of new dwelling units will not translate into housing affordability.
- LI-7 7. Better alternative. An alternative exists that could eliminate unmitigated impacts, enhance quality of life, and keep faith with the intention of the citizens' committee. This alternative is to keep the focus on adding and expanding urban villages in selected areas, while keeping within the overall capacity of the community plans. Instead of just adding development, we could relocate it from less suitable areas to more suitable areas-- within a community or between communities.
- LI-8 8. Throwing out the old. The DEIR aims to replace the Goals and Guidelines in the 1990 General Plan. However, most of these goals and guidelines are not obsolete. Many sections of the existing plan are needed more now than ever, and are not adequately covered by the new strategy as described in the DEIR.

COMMENTS ON THE STRATEGY

- LI-9 1. Vision vs. reality. At its utopian best, the City of Villages strategy would lead to vibrant, walkable core areas where residents could mingle and enhance their sense of community. Some residents, at least, could work within walking distance of their homes. Those who needed transportation would be served by a vastly expanded mass transit system. This would all take place within well-defined urban limits, with open space and backcountry habitat preserved for the sake of sustaining a healthy ecosystem.
- The reality, as predicted in the DEIR, will be worsening traffic and air quality, overburdened parks, and shortages of energy and water. The main reason for the disparity is the strategy's reliance on questionable forecasts and blind adherence to the accommodation approach.
- LI-10 2. Faulty foundation and induced growth. The foundation for the strategy is a forecast allocation which predicts a shortfall of 17,000 housing units in the City by 2020. The regionwide forecast, and the subsequent allocation of a portion to the City of San Diego, contain many questionable assumptions, with high degrees of error resulting.
- There is a circular nature to the forecasting and accommodation of growth. The regional planning agency creates a forecast, decides how much population and housing should be allocated to the various jurisdictions, and encourages them to upzone when necessary to meet the forecasted number of homes. The City that upzones, of course, will find that the population increases as the additional homes are authorized and built.
- Naturally, this can't continue *ad infinitum*, and the draft SFE does not address the long term implications of a strategy of continuous intensification.

STAFF RESPONSE LI-6: Comments noted. The commenter's affordable housing solution ignores the housing shortfall projected for year 2020 and the other features of the proposed City of Villages which includes accessibility to an expanded transit system, walkability, and public open space.

STAFF RESPONSE LI-7: Comments noted. While the commenter's suggestion retains potential village development amenities, it ignores the housing shortfall projected for year 2020.

STAFF RESPONSE LI-8: Comment noted. The proposed new Strategic Framework Element will retain applicable features of the replaced Guidelines for Future Development.

STAFF RESPONSE LI-9: The distributed DEIR did not "predict" worsening traffic and air quality. The DEIR determined that the potential impacts of the proposed City of Villages strategy could add to a significant condition; therefore, pursuant to CEQA, regional traffic and air quality impacts were determined to be significant and unmitigated. Refer to previous Staff Response LI-4.

The distributed DEIR did not determine any of the commenter's cited "shortages of energy and water", both issues were fully addressed and determined not to be significant effects. SANDAG is the regional planning agency, and this agency conducts regional population growth forecasts which are relied upon by not only the City but by public agencies and businesses in the San Diego region to plan for the long-term future.

STAFF RESPONSE LI-10: Comments noted. It should be noted that even without sufficient housing, the population would continue to grow; some residents would share housing within the City and others would live elsewhere and work in the City. It must be recognized/considered that the City currently has 40% of the region's population and 60% of the employment.

The commenter's suggested limit to forecasting and growth accommodation has been considered with this current strategy effort. The proposed 5-Year Action Plan (April, 2002) which set up implementing actions for the Strategic Framework Element, contains a monitoring program to track the implementation of the proposed strategy. Included in this program is the Legacy 2020 (a.k.a. Sustainable Community Program Indicators), a set of quality of life indicators. These indicators are intended to be used to measure long-term sustainability which would include the enjoyment as well as preservation of the region's amenities such as parks, beaches, bays, and canyons. As a minimum, this proposed tracking would somewhat quantify the continuing impact of growth and alert the City of any approaching an overuse condition.

LI-11 3. Goals without a mechanism. Smart Growth, at its core, means in-fill development instead of suburban and rural sprawl. The City of Villages is not proposed instead of other development, it's in addition to other development underway and in the planning stages. The DEIR references vague goals about preserving open space, but contains no mechanism for achieving this in either the City or in other jurisdictions. The strategy will predictably lead to densification of the urban areas while suburban and rural development continues.

LI-12 No funding mechanism has been identified to provide for needed capital facilities, operation and maintenance. It is inadequate to list mitigating actions without identifying the funds to carry out those actions. For decades, our communities have been absorbing the new development without the needed infrastructure and public facilities.

LI-13 4. Unmitigated impacts mean reduced quality of life. The existence of substantial unmitigated impacts is contrary to the originally stated goal that the strategy would maintain or improve the quality of life for residents. The DEIR clearly indicates that traffic congestion will get worse with the addition of 17,000 to 37,000 more homes. Other claims of full mitigation in the report are not substantiated by sound evidence. This is true for air quality, waste disposal, energy, solid waste and recreational facilities, among other items.

LI-14 The report's treatment of park and recreational facilities is particularly deficient and is an insult to present and future residents. The City is already deficient by hundreds of acres of park needed to meet standards. At 2.8 people per dwelling, the strategy to add 17,000 to 37,000 dwellings would result in an additional population of 47,600 to 103,600. At a standard of 20 acres per 1000 people, a minimum of 950 acres of parks would be needed. The report contends that the current guideline is "difficult to attain" and then seeks to persuade us that urban canyons can be used as a substitute for new parks. This "give up" approach, if carried over to the final strategy, will doom the City of Villages, and is contrary to CEQA provisions regarding mitigation.

LI-15 It stands to reason that residents of higher-density areas have a greater need for public parks than residents in detached homes with yards. Meeting park standards may be difficult, but the mechanisms are available. State law allows impact fees to be assessed that are adequate to fully mitigate the impacts of new development. But we need the resolve. As one community leader stated, "If we need to bulldoze an entire block to provide parks and playing fields, that's what we need to do maintain the quality of life".

LI-16 5. Housing needs.
a. The affordability of housing is more important than sheer numbers of new units. We would achieve better results by making sure that a proportion of new units are affordable by low and moderate income residents, rather than base the strategy on adding 17-34,000 units above existing capacities. In other words, make what we do build affordable. \$400,000 condominiums are not "affordable housing".

STAFF RESPONSE LI-11: It should be noted for SANDAG's 2020 forecast, smart growth principals were applied based on an expanded transit vision; this included the previous 50,000 addition units for the City of San Diego. Results of this effort showed that 400,000 acres of the backcountry would be spared from development

STAFF RESPONSE LI-12: Refer to previous Staff Response B-34.

STAFF RESPONSE LI-13: Refer to previous Staff Responses LI-4 and LI-9.

STAFF RESPONSE LI-14: Refer to previous Staff Response LI-1.

STAFF RESPONSE LI-15: Park standards are population based and not tied to whether the population lives in attached or detached homes. In addition to traditional impact fees, attached (higher density) housing developers are often required to provide private open space.

STAFF RESPONSE LI-16: The Strategic Framework Element contains policies to both increase the housing supply and increase the diversity of housing types and costs. Home prices are based on what the market can bear. When the supply of housing is lower than the demand for housing, prices rise to the highest bidder. Only by increasing the housing supply is it possible to meet the demand, thereby creating more affordable housing opportunities (short of inclusionary housing).

LI-17 b. We can make sure that a meaningful proportion of new housing is affordable to low and moderate income households by using proven methods. These include a policy of 20% inclusionary zoning plus more substantial linkage fees which tax industrial development with their share of housing costs.

LI-18 6. Replacing good policy with questionable strategy.
The DEIR states: "The proposed growth strategy (City of Villages) would replace the current Guidelines for Future Development chapter in the Progress Guide and General Plan" because the existing guidelines are no longer applicable. This is not true. Sections I through VI of the current guidelines are generally applicable today. They contain goals such as "public facilities at the time of need" and "encourage in-fill development". Another existing goal is "require that public facilities reasonably attributed to new development will be provided by new development and not by existing residents". The DEIR, to be adequate, should include evidence that the new provisions are as environmentally adequate as the existing ones.

LI-19 7. Go-ahead now, plan later. The DEIR fails to adequately address issues that must be addressed at the program level. Were these issues to be deferred until the Master EIR, as proposed, or site-level reports, there would be no way to assess the impact on a citywide, regionwide, or cumulative basis, as required by CEQA.

LI-20 8. Traffic. The analysis of transportation has multiple deficiencies.
a. The DEIR does not include the assumptions for the transportation model.
b. The model was not designed to analyze the effects of large scale in-fill projects and "smart growth".
c. There is evidence that the model is very sensitive to small changes in input data, so that the results are likely to entail a high probability of error.
LI-21 d. City officials and community leaders have both said that the City of Villages cannot succeed without the proposed transportation improvements. Yet there is no funding mechanism in place to assure that improvements will be available before or concurrent with additional burdens.

LI-22 9. Alternatives not properly evaluated. "No Project" and "Slowed Growth/ Reduced" alternatives were not properly evaluated.
a. The objective of preserving vacant and/or sensitive areas is good, but there is no mechanism connecting the strategy with land preservation.
LI-23 b. There is no evaluation of an important option: Create villages by moving capacity rather than adding capacity. The whole idea of smart growth isn't more growth, it's to steer growth to the most suitable areas.
LI-24 c. The City hasn't been able to deal with the existing population, and attendant impacts on traffic, open space, air quality, etc. It will be a huge job to deal with additional capacity already in the community plans-- 90,000 new homes! The strategy in the DEIR adds a third layer of impacts that would need to be dealt with.
d. We need to be sure we can provide for existing residents and those to be accommodated under existing community plans before adding more development, more

STAFF RESPONSE LI-17: These incentives for affordable housing are under discussion per the Housing Element update. Ultimately, these policies are a political decision.

STAFF RESPONSE LI-18: Refer to previous Staff Response LI-8.

STAFF RESPONSE LI-19: The distributed DEIR as it relates to the subject regional scope of the proposed project, proposed strategy to guide future growth and development without any land use change, has been prepared to be consistent with CEQA and City guidelines. It is an adequate CEQA document, and all CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization. Subsequent implementing actions which require the preparation of a second-tier EIR can reference this initial first-tier, program-level EIR for citywide, regionwide, and cumulative impacts; however a subsequent EIR must refine these impacts. This initial City of Villages EIR is not sufficiently detailed that subsequent site-specific document can rely solely on the analysis of this initial EIR. All issues including impacts considered not significant or significant and unmitigated in this initial EIR, must be reconsidered in subsequent documents.

STAFF RESPONSE LI-20: CEQA does not require this EIR to provide the level of technical detail contained in the assumptions of the transportation model. The model was designed to project regional traffic impacts as a result of new development. At the regional level, this is a state of the art transportation model.

STAFF RESPONSE LI-21: Implementing village type development would not occur without ready access to viable transit; however, potential village development can be phased with transit improvements

STAFF RESPONSE LI-22: Refer to previous Staff Response LI-2.

STAFF RESPONSE LI-23: The commenter's suggested alternative is contrary to the expressed intent of the proposed City of Villages strategy in that the City relies on SANDAG population forecast which predicts that there would be a shortfall of 17,000 homes in the year 2020. A viable alternative to the proposed project must result in some increase to the overall housing yield of the community plans, to satisfy the expressed intent/need.

STAFF RESPONSE LI-24: Refer to Staff Response A-7.

STAFF RESPONSE LI-25: Refer to previous Staff Responses B-85, B-86, and B-87.

STAFF RESPONSE LI-26: Comments noted.

STAFF RESPONSE LI-27: The commenter's cited nine cities are not isolated entities; their common refusal to allow densities which promote attached housing affects the region. These cities can ignore the population forecast because addition housing or population historically could go elsewhere in the County; now they can go to the bordering county. Some cities in our region appear to attempt to grow a higher tax base by luring business without providing affordable housing within their jurisdiction for the workers of these attracted businesses; they seem to value homogenous, higher end detached homes and an abundance of revenue generators. This causes surrounding jurisdictions to experience an unfavorable jobs-to-housing balance. Others wish to stay a homogenous community of mostly attached homes and adequate service commercial uses. These paths of exclusiveness are no longer available and possibly not the desired direction for the City of San Diego where there is a long-established, wide variety of housing types, neighborhoods, and employment. The proposed City of Villages strategy recognizes the diversity of our City and attempts to strike a balance between housing and employment such that growth can continue to occur without detriment to any particular sector of its residents or to the City as a whole and with preservation of the City's defining natural resources.

STAFF RESPONSE LI-28: This level of detail will be discussed during the creation of an Economic Prosperity Element. Please refer to Staff Responses D-5 and D-6.

STAFF RESPONSE LI-29: The Strategic Framework Element contains policy to, "provide equitable access to educational opportunities which result in a highly qualified and productive workforce," and "develop public/private partnerships and pursue local, state, and federal grants to provide high technology education and job training at all levels." Additional details will be discussed during the creation of the Economic Prosperity Element. Please also refer to Staff Response B-76.

STAFF RESPONSE LI-30: Refer to previous Staff Response LI-23.

population, and more impacts. Existing deficits are huge, estimated at \$300 million for deferred maintenance and a \$2.9 billion shortfall in capital costs of facilities.

LI-25 e. To address alternatives in a cursory manner is a fundamental violation of CEQA and an injustice to the residents of the City and region. Before embarking on a program that is expected to require huge capital investments, and which will create unmitigated impacts on traffic and air quality, don't the citizens deserve an in-depth review of alternatives?

LI-26 f. The DEIR dismisses the Slow/ Reduced Growth alternative by claiming that "Attempts to slow or reduce growth usually result in disproportionate impacts on lower income individuals and households." This claim is made without evidence. To the contrary, there is evidence that lower income people depend more heavily on public facilities than others. They cannot afford private schools and health clubs, far-away vacations, and air purifiers/ water purifiers in their homes. Low income people are harmed when subsidized rapid growth drains resources that would be used for public facilities.

LI-27 g. Nine of the region's cities have already achieved slow growth or stable populations, growing at less than one-half the national rate. This belies the often-made claim that population growth is inevitable and the best we can do is try to accommodate it in the least damaging way possible. The available evidence is that a city like San Diego will experience growth in industry and residents according to the land use plans enacted by the City. We will get what we plan.

LI-28 h. Adding housing to "meet demand" is a futile and unsustainable approach unless coupled with a program to affect the demand. Some other cities have taken the lead in addressing the jobs/ housing balance, asking boldly-- Do we have too little housing or too much land zoned for commercial and industrial development? Are we encouraging and subsidizing an influx of workers that will outstrip our ability to accommodate them with housing and public facilities? As an example, the city of Boulder, Colorado, conducted a land inventory and found that they had an excess of industrial zoned land relative to the amount of housing that was available or could reasonably be provided. They took steps to downzone some of the industrial land and acquire other parcels for park use. Studies have shown that Boulder, with its 30 year history of greenbelt acquisition and other active growth management programs, has not experienced increases in housing prices relative to nearby cities."

LI-29 i. The report mentions "subsidies to growth inducing industries" but provides only a cursory review of this important topic. Left unexplored were how much these subsidies cost the City, what proportion of new jobs are filled by newcomers, and how much of the strategy's facility cost could be covered with money not spent on subsidies. An obvious example of a subsidy are the very low impact fees charged for industrial development.

LI-30 10. Better alternative. An alternative exists that could eliminate unmitigated impacts, enhance quality of life, and keep faith with the intention of the citizens' committee to avoid inducing growth. This alternative is to keep the focus on adding and expanding urban villages in selected areas, while keeping within the overall capacity of the community plans. Instead of just adding development, we could relocate it from less suitable areas to more suitable areas-- within a community or between communities.

What justification would the City have in staying with the total existing housing capacity?

LI-31 a. Forecasting is a highly inexact science, as evidenced by the recent change in SANDAG's forecast that resulted in a reduction in the City of San Diego allocation from 50,000 additional homes to 17,000 additional homes. Given the demonstrated high degree of error, it's reasonably likely that the existing community plan capacities are sufficient for 20 years of future housing demand.

LI-32 b. Even if we accept the current forecast allocation, there is enough capacity in the current plans for about 18 years of forecast population and housing needs.

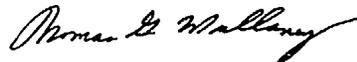
LI-33 c. The City has not been able to meet the needs of current residents, as evidenced by non-attainment of air and water quality standards, a \$300 million maintenance backlog, and a \$2.9 billion shortfall in infrastructure and public facilities. The City faces huge challenges in providing for the new development already contained in community plans. It is very likely that 17,000 to 37,000 additional homes over and above the existing community plans will prevent attainment of state and federal environmental standards, worsen traffic conditions, add to crowding of parks and schools, and further burden taxpayers.

LI-34 d. We must start to plan for sustainability rather than continue with a model of "forecast/ upzone/ build" that will be repeated until our environmental, financial and social systems break down.

LI-35 11. Monitoring. The strategy is incomplete in that it lacks a monitoring system. The City needs a monitoring group like the Chula Vista Growth Management Oversight Committee to review progress and report to the City Council and the citizens annually.

LI-36 12. Blind faith. The report puts too much blind faith in Smart Growth, without adequate analysis. We can learn from the experience of Richard Carson, the former planning director of Metro, the Portland, Oregon, regional agency (not the same as the local Dr. Richard Carson). The following excerpt is from the American Planning Association Magazine.

"Smart Growth promises many answers to the problems that face planners today. But like the equally trendy New Urbanism, it is an intellectual solution, not necessarily a practical one-- and not necessarily a new one. In reality, smart growth only slows growth, while New Urbanism simply makes increased density more enjoyable. Neither doctrine alone can change the fact that growth in metropolitan areas will result in overcrowding, traffic congestion, and poor air quality. Gridlock is simply a function of too many people living in an area, and no concurrency policy or dollar outlay can fix it."



Thomas G. Mullaney, Chair
Friends of San Diego

DEIR0326

STAFF RESPONSE LI-31: The commenter's assertion that since forecasting is highly inexact that it is reasonably likely that existing plan capacity is sufficient and that none of the projected 17,000 additional homes would be needed in 20 twenty years is a reach. The City of San Diego can not take this risky chance and go with the status quo. Refer to previous Staff Response LI-23.

STAFF RESPONSE LI-32: The need for additional homes to meet the forecasted demand is more accurately portrayed as the catalyst to begin the process of updating the current Progress Guide and General Plan with the proposed strategy to guide future growth and development; however, it is simplistic to cite the future housing need alone as the sole intent of the proposed City of Villages. Another major factor is the provision for a more compact, future redevelopment/infill of mixed use villages and transit corridors with enhanced walkability and sense of community through design and amenities and concurrent improved public transit. In addition, as a larger percentage of the population becomes made up of retired seniors and as the population becomes more stable, there may be a need to have the convenience of smaller, attached units in compact villages in each community such that those who no longer wish or need a larger detached home can move without leaving the community. This integration of people of all ages within an area could stabilize neighborhoods, enhance a sense of community, and ensure that some residents would always be in the village vicinity.

If the City waits too long to plan for the future urban form, until the housing need approaches the commenter's cited 18 years capacity, opportunities could be lost for another twenty years until the new, possibly lower density residential units built in this interim 18 years, begin to age and become ripe for redevelopment and at this time, the outer ring of suburban development becomes ripe for redevelopment without any long-established, transit improvements in the urban core which can be efficiently extended to the redeveloping suburbs.

STAFF RESPONSE LI-33: There are policies in the Strategic Framework Element which address all of these issues as well as how to ameliorate the negative impacts. Implementation of the City of Villages strategy, the Transit First strategy, and other multi-modal improvements such as High Occupancy Vehicle Lanes, Transportation Demand Management, Transportation Systems Management and Regional Infrastructure Improvements will provide greater mobility options for people and result in the following improvements: Decrease in congested freeway miles from 77 miles to 29 miles (62% decrease), increase in Vehicle Occupancy from 1.1 persons/vehicle to 1.35 persons/vehicle (23% increase), and achieve approximately 10% of all trips by transit, walking, and biking. Please also refer to Staff response A-7.

STAFF RESPONSE LI-34: Refer to previous Staff Response LI-10 (Paragraph 2).

STAFF RESPONSE LI-35: Refer to previous Staff Response LI-10 (Paragraph 2).

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- LI-31 a. Forecasting is a highly inexact science, as evidenced by the recent change in SANDAG's forecast that resulted in a reduction in the City of San Diego allocation from 50,000 additional homes to 17,000 additional homes. Given the demonstrated high degree of error, it's reasonably likely that the existing community plan capacities are sufficient for 20 years of future housing demand.
- LI-32 b. Even if we accept the current forecast allocation, there is enough capacity in the current plans for about 18 years of forecast population and housing needs.
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Thomas G. Mullaney, Chair
Friends of San Diego

DEIR0326

NANCY A. BURKHART

3220 1st Avenue, #304
San Diego, California 92103
(619) 220-8971
(619) 220-8981 FAX

March 8, 2002

City of San Diego Land Development Review Division
Development Services Center
1222 First Avenue, Mail Station 501
San Diego, California 92101

Re: Comments on City of Villages DEIR

Mm-1 | The DEIR cites a need for more specific traffic analysis for village development. However, the Report alleges that the project's traffic impact "is significant" because traffic congestion would continue to be a regional problem.

Mm-2 | The Report fails to consider the reasons behind regional traffic congestion, and how the village concept might help to alleviate the problem.

Mm-3 | For example, Interstate 15 is a massive parking lot going south in the morning and north in the evening. SANDAG has said a major reason for this congestion is that people who have been unable to find affordable housing in San Diego, near their work, have moved to Temecula. If the City of Villages cannot provide more affordable housing in a more friendly atmosphere with a better quality of life, perhaps people would not have to commute as far as Temecula to their places of employment. Thus, the City of Villages could not be forced to shoulder the blame for commuter congestion.

Mm-4 | Perhaps more consideration should be given to the transportation portion of the DEIR.

STAFF RESPONSE Mm-1: The distributed DEIR addressed regional traffic and determined that regional freeway congestion would be significant and unmitigated. This analysis did not cover local or community-level traffic which must be considered in the subsequent environmental review for future community plan updates or amendments which would implement the proposed City of Villages strategy.

STAFF RESPONSE Mm-2: The distributed DEIR disclosed the modeled results which showed that transit ridership, walking, and bicycling would account for 9% to 10% of the total trips in the year 2020; this was determined to be partial traffic mitigation. These are the only quantified results which could be used in the CEQA determination; there are many qualitative benefits, but these could not be substantiated numerically. With subsequent, refined transit data and specific village sites with detailed design, the non-vehicular trips are expected to increase.

STAFF RESPONSE Mm-3: Comments noted. The distributed DEIR did not determine that the City of Villages strategy would cause significant traffic impact. The freeway congestion expected to decrease from the current 77 miles of congestion to 29 miles in the year 2020 was based on the higher SANDAG2020 forecast. The proposal would contribute relatively small amount of trips to a significant future condition; therefore pursuant to CEQA analysis, the traffic impacts were determined to be significant and unmitigated.

STAFF RESPONSE Mm-4: The commenter's cited benefits are more appropriate for the Findings and Statement of Overriding Considerations.

Cordially,

Nancy A. Burkhart

RECEIVED

MAR 14 2002

Strategic Framework

Michael Conroy
3996 Shasta St. #103
San Diego, CA 92109

S/S (MFWK) DEIR June 04
Conroy
MAR 29 2002
PLANNING DEPARTMENT

March 26, 2002

Anne Lowry, Senior Planner
1222 First Ave., MS 501
San Diego CA 92101

Re: LOR-DEIR
No. 40-1027

Dear Ms. Lowry,

Please consider and respond to the City of Villages Growth Strategy (Strategic Framework Element (COV/SFE) concerns and comments following:

Nn-1 | (A) Specific policy measures to promote accessibility for persons with mobility impairments in all new housing are needed. Will they be included? If not, why not?

Nn-2 | (B) City Staffs' prior responses to suggestions of (e.g.) "Universal Design Standards" in housing were statements such as "there are no standards." We know that's why such standards are again proposed to be developed in the City. The existing "standards": model codes, city

Nn-1: Specific policy measures to promote accessibility for persons with mobility impairments in all new housing are needed. Will they be included? If not, why not?

This plan does not propose specific legislation beyond ADA requirements. The Element recommends that all pedestrian pathways, crosswalks, sidewalks, and transit be accessible to all users with the intention that accessibility be a citywide consideration for all types of land uses. To facilitate this, the Element recommends more pedestrian-friendly site grading with the understanding that such grading should also be accessible to all users. Requiring all new residential development to meet minimal adaptability standards could affect housing affordability and homeowner choice, however staff is monitoring universal design and visitable housing programs in other cities such as Santa Monica and Irvine.

Nn-2: Comments duly noted. Please see response to Nn-1.

permitting practices, etc., are wholly inadequate for persons with disabilities.

Will we be innovative, or perpetuate the past?

① New Standards of "Visitability" or "Adaptability" include the following, de minimus features:

- ① No Step Entrance
- ② Wide Doors throughout
- ③ Bathrooms large enough to permit wheelchair user to enter
- ④ Reinforced Wall by commode sufficient for installation of grab bars
- ⑤ Light switches + electrical outlets at reachable heights on walls.

Nn-3

Nn - 3: Comments duly noted. Please see response to Nn - 1.

Nn - 4: Comments duly noted. Please see response to Nn - 1.

These features should be required at time of construction for all new housing. Detailed Dimensions are easily determined once the City sets policy to do so. Will the City continue to promote and permit housing unusable by persons with disabili.

Nn-4

Nn-5

(D) The COV / SFE Action Plan also appears lacking in specificity to promote greater "accessible housing options for persons with disabilities." The DEIR states such "needs to be considered." (pp 7-8). How does the City propose to "consider" this? How, exactly, will it promote improvements in the stock of housing for the mobility-impaired?

Nn-6

(E) Housing above retail is proposed. Will elevators be required? Will the housing proposed in pilot City of Villages projects be accessible, adaptable, and visitable by all persons, regardless of ability?

Nn-7

(F) Everywhere the documents mention "affordable" housing, why not add "accessible" housing, with definitions?

Nn-8

(G) Everywhere the documents mention "walkability", pedestrian and bicycle-friendly, why not add "wheelchair-friendly".

Nn-5: Comments duly noted. Please see response to Nn-1.

Nn-6: Comments duly noted. Please see response to Nn-1.

Nn-7: Comments duly noted. Please see response to Nn-1.

Nn-8: Comments duly noted. Please see response to Nn-1.

Nn-9

(H) Should not discussions of "effective and innovative redevelopment and infill" include all of the above?

Nn-10

I) The DEIR and subsequent booklets do mention the needs of the disabled, and desirability of aging in place as citizens age. However, several clauses regarding principles of Universal Design, and Viability in new housing, is Unacceptable.

Nn-11

"Quality of Life", "Neighborhood Quality", "Social Equity", "Equitable Development" and other discussions in city planning documents must all include specific consideration of the needs of all citizens.

Thank you for the opportunity to write, and for your responses.

Sincerely,
Michael Conroy

Nn-9: Comments duly noted. Please see response to Nn-1.

Nn-10: Comments duly noted. Please see response to Nn-1.

Nn-11: Comments duly noted. Please see response to Nn-1.

P.O. Box 83293
San Diego, CA 92138-3293
March 24, 2002

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

Re: DEIR (LDR No 40-1027)

To Whom It May Concern:

RECEIVED

MAR 26 2002

STAFF RESPONSE Oo-1: Refer to Staff Responses B-31 and B-32.

STAFF RESPONSE Oo-2: Refer to Staff Response B-32.

STAFF RESPONSE Oo-3: Refer to Staff Response B-32.

CEQA states that the EIR must cover the cumulative effects of development on the region.

Oo-1

Presently, despite the recent conclusions of the Metropolitan Water District, the water supply for the area is a serious concern. At present, we are over federal allocation by some 20 % (I believe it is w.r.t. the Colorado River water allocation, but I am not sure.) The water table in the Central Valley is subsiding. This is with the present state of affairs. The fact that water use per capita is expected to go down is important. This MAY allow the environment that is being destroyed due to our appetite for more water to recover. It should be counted upon as something that must occur to remedy an already bad situation. The fact that water use per capita is going down can not be used to support desires to build more in the San Diego region and is irrelevant. Similarly, given the state of affairs with the overuse of water, the fact that conservation measures are being employed (and still there is a problem!) is also irrelevant. More people means more water will be needed than would be used with less people. The impact will still be negative.

Oo-2

Any water projects that generate more water for the San Diego region must be evaluated in terms of the effect that they will have on endangered species, water quality, or farming interests over a long term. If the water table is dropping due to too much water being removed from it, then the environmental impact is unacceptable. It does not matter if it will take 30 years for it to drop to the point where no more water can be taken from it—unless the water table is stable over a long time, we are only creating a much larger problem for the future. We are borrowing against a future “water bank”. Taking more water from an area, and relying upon projects that are environmentally damaging to get more water has an environmental impact. The environmental impacts of the water projects themselves need to be considered as part of the EIR.

Oo-3

Bringing more water from the north requires that it be pumped over the mountains north of Los Angeles. This requires power. The added power that must be generated to pump this water must be considered in the EIR in terms of added pollution and other environmental consequences of power generation. A desalinization plant requires extra power as well—the same consideration applies—in addition to the effects on the ocean species such a plant would have.

Oo-4 In addition, there are serious doubts about the long term supply of water overall in Metropolitan Water District for the San Diego region. See the article in the San Diego Union-Tribune on February 28th, 2002 by Michael Gardner, "County loses bid to get better deal from its water wholesaler", incorporated herein by reference.

Oo-5 Remember as well that the starting point for the EIR must assume that all of the proposed developments that presently exist in the community plan are built out to 100% capacity. That is the starting point vision for the city. Under that assumption, there will, unless there is a major change in city financing policy, a serious deficit in services, including libraries, parks, etc. will exist in large areas of the city, particularly in the Bankers Hill/Park West area of the city. Traffic problems will be quite bad, especially 1st, 4th, 5th, 6th streets, and Laurel. There is no viable study of what traffic patterns will be assuming 100% build-out even at present allowed densities. Part of the impact that must be considered is how long it will take for a car that wants to turn onto Laurel (esp. a left turn) from any one of the side streets (2nd, 3rd, Bryant, Albatross, etc.) will have to wait. At this time, during some parts of the day, it is quite difficult, and one must wait a matter of a minute or more. One must consider 100% build out as the starting point, and then reconsider what the additional density would entail. Is the present 100% build out already unacceptable? Laurel street is very narrow and can not be expanded easily, and yet it is a primary feeder for the Park West area. The Laurel street hill is too steep to add traffic capacity to it. A bus line down 4th and 5th is insufficient for the added traffic that the proposed density would create, much less the extra proposed in the Draft EIR.

Oo-6 Now we add more density. It makes no sense to make assumptions about all the projects that will be built to add to city services until we can find money for them. It is unlikely the present residents will support further taxes to subsidize extra development in their communities, given the environmental impact. Thus, all the money for the extra services must come from the developers themselves. This includes money for water projects, desalinization plants, road improvements, etc. Unless money for these projects that must be done to mitigate the environmental effects is clear where it can come from, it makes no sense to assume the existence of the projects. The city presently has a serious red ink problem as it is, and it is projected to get worse.

Thank you for your attention to these comments.

Sincerely,



Paul R. de la Houssaye

STAFF RESPONSE Oo-4: Refer to Staff Responses B-31 and B-32.

STAFF RESPONSE Oo-5: Refer to Staff Responses A-18, B-16, B-18, B-19.

STAFF RESPONSE Oo-6: Refer to Staff Response A-7 and B-14.

Drew DeShazo
5273 Cole Street
San Diego, CA 92117

CITY OF SAN DIEGO
MAR 12 2002
PLANNING DEPARTMENT

March 1, 2002

Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Center
1222 First Avenue
Mail Station 501
San Diego, CA 92101

RE: Comments on the Draft Environmental Impact Report for the City of Villages

Dear Mr. Monserrate:

I have reviewed the Draft Environmental Impact Report for the City of Villages. I have the following concerns regarding the document and the plan.

Section N., Recreation Facilities:

- Pp-1** | The document states that there is currently a deficit of park and recreation facilities in the urban core of the city and that the introduction of 17,000 to 37,000 additional attached homes will add to the shortfall. The document specifies two mitigation measures to reduce the impact to an insignificant level; (1) Provide more activities or facilities on existing park land or (2) enhance urban canyons through riparian restoration and adding trails.
- Pp-2** | (1) The mitigation does not address the shortage of space for high-impact activities such as off-leash dog parks and BMX bicycle courses.
- Pp-3** | (2) Recreation in the urban canyons should be limited to low-impact activities, but high impact activities are impacting urban canyons now because of a lack of space in developed parks.
- Pp-4** | (3) Since there is a shortage of park land in the urban core now (IV-97) adding facilities or activities to existing park land in the urban core is not always possible or practical.

Section F., Noise

- Pp-5** | The document does not cover the impact of increased noise on existing dwellings.

STAFF RESPONSE Pp-1: Comment Noted.

STAFF RESPONSE Pp-2: Comment Noted.

STAFF RESPONSE Pp-3: Refer to Staff Response LI-1.

STAFF RESPONSE Pp-4: Refer to Staff Response B-54.

STAFF RESPONSE Pp-5: Refer to Staff Responses B-46 and B-48.

Section VII., Mandatory Discussion Areas

Pp-6 The section on *Neighborhood Character and Aesthetics* reaches conclusions not supported by the scope of the document. The document states, "The proposed City of Villages protects existing single-family neighborhoods." The document does not address the impact of increased density on existing single-family homes near the villages with regards to noise, traffic pushed onto residential streets because of increased traffic on neighborhood arterial streets (cut-through traffic), and parking overflowing into single-family housing areas.

Pp-7 The document also states that urban design features would promote walkability. There is no analysis on the impact the increased traffic from increased density will have on the walkability in areas near or around the village. Increased traffic from the increased density could have a negative impact on walkability in areas around or near the village that are not equipped with urban design features. Overall, there could be a reduction in walkability for a specific neighborhood.

Section G., Storm Water/Water Quality

Pp-8 I have concerns with the many references in this section to adding more storm drain water to urban canyons. Adding more storm drain water to urban canyons has the potential to increase the problems created by exotic pest plants and animals, contribute to existing erosion problems or create new erosion problems, add unwanted infrastructure to canyons, and to displace native vegetation. In addition, page IV-59 of this section states that storm drain water can be a human health problem, but on page IV-94 adding more polluted water to urban canyons is explained as an opportunity to enhance urban canyons.

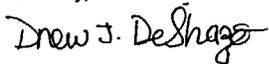
The city needs to find a strategy that will protect the coast without sacrificing urban canyons.

STAFF RESPONSE Pp-6: Refer to Staff Responses B-9 and B-10.

STAFF RESPONSE Pp-7: Refer to Staff Response A-18 and B-41..

STAFF RESPONSE Pp-8: Refer to Staff Response LI-1.

Sincerely,



Drew J. DeShazo

MAR 06 2002

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March 4, 2002

Anne Lowry, Senior Planner
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San Diego, CA 92101Subject: Draft Environmental Impact Report (LDR EIR No. 40-1027) for the City of
San Diego Strategic Framework Element - City of Villages Strategy (COV)

Qq-1

I received the subject DEIR as a member of the Centre City Advisory Committee (CCAC), the designated community planning group for the 1500-acre downtown redevelopment area. Upon review, I have decided that I should respond in my capacity as a land use attorney, rather than as a member of the CCAC.

GENERAL COMMENTS

Qq-2

- The subject DEIR does not meet the legal requirements of an EIR.
- The document should follow the required contents of an EIR as detailed in CEQA Guidelines sections 15120 to 15132. [Current CEQA Guidelines are available online at: http://ceres.ca.gov/topic/env_law/ceqa/guidelines/.]
- The most significant failing of the subject DEIR is the failure to comply with CEQA Guidelines section 15125(e), which states:

Qq-3

Where a proposed project is compared with an adopted plan, the analysis shall examine the existing physical conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced as well as the potential future conditions discussed in the plan.

Qq-4

The DEIR focuses on "an additional 17,000 to 37,000 attached homes" over what existing plans can accommodate. The focus should be on what the population is now (baseline) and the total population the project proposes to accommodate (a key project objective). Once this gap is identified, then the project and alternatives can be examined as to their environmental impacts.

STAFF RESPONSE Qq-1: Comments noted; these comments do not address the adequacy of the distributed DEIR.

STAFF RESPONSE Qq-2: Disagree. The distributed DEIR contained all required contents of an EIR pursuant to CEQA Guidelines Sections 15120 through 15131. The commenter's cited Section 15132 (also available online at the commenter's cited website) does not apply to the reviewed distributed Draft EIR; it applies to this Final EIR, and the required contents of this section has been satisfied by this Final EIR.

STAFF RESPONSE Qq-3: The commenter is incorrect in asserting that the distributed DEIR failed to comply with CEQA Guidelines Section 15125(e).

The distributed DEIR did contain a description of the existing/current physical conditions and contained the following analysis:

Traffic - The distributed DEIR analysis depended on the SANDAG's 2020 Regional Transportation Plan. The DEIR disclosed the current, as built/existing freeway congestion (77 miles) and the future year 2020 congestion (29 miles) if listed freeway improvements are made as planned.

Air Quality - The distributed DEIR disclosed the current air quality levels for San Diego and the contributing Los Angeles-Orange air basins and the current air pollutant emissions inventory (the sources of air pollutants). It cited the current, adopted State Implementation Plan (SIP) and its determined regional air pollutant budget to attain the federal standard for ozone.

Paleontology - The distributed DEIR disclosed existing conditions for potential significant fossil resources which could be possibly affected by any future development.

Geologic Hazards - The distributed DEIR disclosed the existing earthquake faults. In particular, the active Rose Canyon Fault was disclosed as potentially impactful to future villages in Mission Valley and Downtown.

Noise - The distributed DEIR disclosed a list of twenty existing major roads that currently pose potential significant noise impacts; included in this list were three areas which currently experience significant aircraft noise and three areas which are subjected to existing trolley noise.

Water Quality - The distributed DEIR disclosed existing impaired water bodies, the current water quality goals/standards (RWQCB), and the recently adopted City regulations. The DEIR also disclosed the current condition of storm drain outlets in all urban canyons; some of which were placed in the MHPA, the City's planned habitat preserve to implement the MSCP. It disclosed the benefit of redeveloping existing, uncontrolled open parking areas with mixed-use development which would most likely require subterranean parking. All runoff from these garages would be collected and treated.

Water Resources - The distributed DEIR disclosed the past to current (2000) water usage in the San Diego region as well as the current water usage in the City. In addition, the DEIR described the existing water facilities in the City including the existing North City Water Reclamation Plant and the aquaculture plant in San Pasqual and the existing building code which requires all new development to install low-flush toilets and low-flow showers. A County Water Authority report which was attached and incorporated by reference, disclosed the water use for the region in the past ten years to the present and determined that the region by 2020 would need 813,000 acre-feet of potable water and that this demand would be met.

Historical Resources - The distributed DEIR considered currently known, significant historic resources designated (listed) by the Historic Resources Board and currently known archaeological sites which have been recorded and mapped.

Wastewater - The distributed DEIR described the existing wastewater treatment system and current generation of wastewater in the Metro service area which includes the City as well as surrounding jurisdictions. The DEIR determined that existing system and the treatment plant now under construction in the South Bay would be able to treat the expected generation of wastewater in the Metro service area in the year 2020.

Energy - The distributed DEIR described the recent trend of energy use in San Diego region between 1990 to current levels (year 2000).

STAFF RESPONSE Oq-4 (continued):

Solid Waste - The distributed DEIR described the current amount (1999) of waste collected and disposed at the City's Miramar Landfill and disclosed that the amount of waste buried has been steadily decreasing since 1990 when a state mandate to recycle was enacted.

Public Health - The distributed DEIR listed the number of known, existing operations handling hazardous materials by existing and potential transit corridors; in addition, it disclosed that 99 existing sources of toxic air pollutants currently operate in the City.

Recreation - The distributed DEIR listed the existing new parkland needs and the acreage by community planning area placed into the MHPA by the adoption of the MSCP in 1997. A map of urban canyons currently placed into the MHPA was also provided.

STAFF RESPONSE Oq-4: The disclosed environmental analysis of the distributed DEIR contained the analysis which not only addressed the additional 17,000 to 37,000 attached units which may ultimately result for the subsequent implementation of the proposed City of Villages strategy but also the expected regional and/or citywide growth to the year 2020. The impact analysis of the DEIR included the following:

Traffic - The distributed DEIR disclosed the current, as built/existing freeway congestion (77 miles) and the year 2020 congestion (29 miles) if listed freeway improvements are made as planned. This congestion as estimated in the 2020 RTP is the result of all growth in the region. The project effects of adding 180K to 240K average daily trips (ADT) to the regional system in 2020 was modeled for the impact analysis in the distributed DEIR. Due to the although reduced but still congested (29 miles) freeways in the year 2020 and the potential numerically small but nonetheless incremental contribution of the additional trips generated by the proposed 17,000 to 37,000 attached homes, the traffic impacts were determined to be significant and unmitigated.

Air Quality - The distributed DEIR disclosed the current air quality levels and the current air pollutant emissions inventory (the sources of air pollutants).

The distributed DEIR followed the generally accepted CEQA impact analysis for air quality by comparing the project's expected air pollutant emissions to the emissions levels which the State Air Resources Board (ARB) (with local Air Pollution Control District's (APCD) input) has determined to be the level where ambient air pollutants meet federal health standards. The plan to attain this level is entitled the State Implementation Plan (SIP); it is required by federal Clean Air Act and is approved by the US Environmental Protection Agency. San Diego's remaining air pollution problem is ozone, a photochemical product of reactive hydrocarbons (i.e. unburned fossil fuels) and oxides of nitrogen (product of high temperature fuel combustion). The major source of these ozone-precursor pollutants in San Diego is motor vehicles. The proposed strategy to guide future growth and development would ultimately result in additional 17,000 to 37,000 attached homes. This range of additional homes were modeled for the year 2020 to estimate their motor vehicle, construction, as well as area source (solvent usage, cleaners and small utility engine usage) air pollutant emissions.

A budget for the ozone-precursors was set with the '94 SIP and confirmed in the 2000 update which stated that all measures to attain the federal ozone standards in the '94 SIP are adequate, and no new revised budget or new measures would be required.

The 2020 RTP included an air conformity analysis which stated that the expected air pollutants from all motor vehicles in the year 2020 is consistent with the regional air quality plan/strategy. However the pollutants which can be expected from construction of the additional homes and the area source pollutants from these residents were not accounted for in the 2020 RTP conformity analysis; therefore, the air quality impacts were determined to be significant and unmitigated.

Paleontology - The distributed DEIR disclosed existing conditions for potential significant fossil resources which could be possibly affected by any future development. However, the proposed COV strategy with its compact, intensified mixed-use villages and possible replacement of open parking areas with more land-efficient underground garages would require excavation. This grading may impact fossil resources. The disclosed impact analysis and mitigation would apply to any development requiring discretionary approval.

Geologic Hazards - The distributed DEIR disclosed the existing earthquake faults. In particular, the active Rose Canyon Fault was disclosed as potentially impacted future villages in Mission Valley and Downtown. The disclosed impact analysis and mitigation would apply to any future commercial, industrial, or multi-family residential development in these two potentially affected areas.

Noise - The distributed DEIR disclosed a list of twenty major roads that currently pose potential significant noise impacts; included in this list were three areas which currently experience significant aircraft noise and three areas which are subjected to trolley noise. The disclosed noise mitigation would apply to any future multi-family residential development in these affected areas. While the impact of additional traffic noise to these roads was not addressed due to the lack of specificity of their location (to be determined subsequently), significant noise impact would be caused by a noticeable 3dB noise increase. This is highly unlikely because a 3dB increase would require the project and/or future traffic to be twice the current traffic.

Water Quality - The distributed DEIR disclosed existing impaired water bodies, the current water quality goals/standards (RWQCB), and the recently adopted City regulations. The DEIR also disclosed the current condition of storm drain outlets in all urban canyons; some of which were placed in the MHPA, the City's planned habitat preserve to implement the MSCP. While the recently adopted City water quality regulations initially apply to most future development (listed in the DEIR) and eventually to all currently existing sources of polluted runoff, the DEIR disclosed the benefit of redeveloping existing, uncontrolled open parking areas with mixed-use development which would most likely require subterranean parking. All runoff from these garages would be collected and treated.

Water Resources - The distributed DEIR disclosed the past to current (2000) water usage in the San Diego region as well as the current water usage in the City. In addition, the DEIR described the existing water facilities in the City including the existing North City Water Reclamation Plant and the aquaculture plant in San Pasqual and the existing building code which requires all new development to install low-flush toilets and low-flow showers. The CWA report which was attached and incorporated by reference, stated that the entire region by 2020 would need 813,000 acre-feet of potable water and that this demand would be met. It should be noted that this CWA projected demand and supply was based on SANDAG's 2020 forecast which has been revised to show less population growth by the year 2020.

Historical Resources - The distributed DEIR considered currently known, significant historic resources designated (listed) by the Historic Resources Board and known archaeological sites which have been recorded and mapped. The DEIR analysis disclosed possible significant impact indirectly posed by the subsequent implementation of the proposed City of Villages, on four significant historic sites and one Native American village site. The disclosed impact analysis and mitigation would apply to any development which may adversely affect a significant historical resource.

Wastewater - The distributed DEIR described the existing wastewater treatment system and current generation of wastewater in the Metro service area which includes the City as well as surrounding jurisdictions. The DEIR determined that existing system and the treatment plant now under construction in the South Bay would be able to treat the expected generation of wastewater in the Metro service area in the year 2020.

Energy - The distributed DEIR described the trend of energy use in San Diego region between 1990 to current levels (year 2000). The DEIR determined that planned imported electricity from Mexicali, Mexico and approved 500-megawatt power plant on Otay Mesa should adequately serve all the expected growth in the San Diego region as well as the additional 17,000 to 37,000 attached homes resulting from the implementation of the proposed City of Villages by the year 2020.

Solid Waste - The distributed DEIR described the current amount (1999) of waste collected and disposed at the City's Miramar Landfill and disclosed that the amount of waste buried has been steadily decreasing since 1990 when a state mandate to recycle was enacted. The DEIR disclosed the estimated remaining 10-14 year expected life of the municipal landfill which is based on trends in waste generation and recycling efficiency and expected population growth. It was determined that the limited life of the Miramar landfill and the uncertainty of the capacity of the privately-owned Sycamore landfill in East Elliott to handle the City waste stream and the additional 17,000 to 37,000 attached units of the proposed City of Villages strategy, would pose a potentially significant and unmitigated impact.

Public Health - The distributed DEIR listed the number of known, existing operations handling hazardous materials by existing and potential transit corridors; in addition, it disclosed that 99 existing sources of toxic air pollutants currently operate in the City. Without specific village/corridor location, the DEIR presented mitigation criteria which would generally mitigate impacts. The impact analysis and disclosed mitigation would apply to any future development which may adversely be affected by hazardous material sites.

Recreation - The distributed DEIR listed the existing new parkland needs and the acreage by community planning area placed into the MHPA by the adoption of the MSCP in 1997. A map of urban canyons placed into the MHPA was also provided. The disclosed mitigation included a statement in the existing adopted Progress Guide and General Plan which explains that where parkland is difficult to acquire, effort to provide park staff and facilities should be directed to compensate deficiencies in the acreage of parkland needed per the guidelines. This situation will be encountered in the implementation of the proposed strategy where subsequent redevelopment and infill would occur in the urban core. In these urbanized, builtout areas, the acquisition of new parkland may require the removal of existing residential development; this would be contrary to the goal of the proposed project to increase housing availability. The possibility of new parkland acquisition as mitigation for new development has been added to the Final EIR. All new development would be required to pay park fees.

Qq-5

Note: The "No Project" alternative is not the build-out of the existing plans, but "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." [CEQA Guidelines section 15126.6(e)(2)] Experience has shown that San Diego developers have not been building to the maximum allowable density.

Qq-6

So, what the DEIR needs to do is to simply state (1) the City's current population, (2) the population the City plans to accommodate, and then discuss the various strategies to accommodate that population--the preferred alternative being the Project.

If CEQA Guidelines were followed and the issues and considerations were clearly and simply stated, the public would not be so frustrated with this document.

OTHER COMMENTS

Qq-7

The discussion of regional setting and regional impacts is inadequate. At a time when elected officials and the general public are finally beginning to understand our regional context, the DEIR should more fully address the role of the Project and alternatives in this context.

Qq-8

Draft Strategic Framework Action Plan (pp. III-8 and 9) This is not an action plan; it is a wish list. It is not clear why it is in the DEIR.

I fully support the City of Villages Strategy. It needs a legally adequate EIR.

Sincerely,

Ann T. Fathy, AICP
Attorney at Law

cc: Gail Goldberg
Joyce Summer

STAFF RESPONSE Qq-5: On a strictly policy level, the existing condition of a "No Project" alternative is the existing Guidelines for Future Development in the current Progress Guide and General Plan as well as the existing as-built condition. The commenter's cited "what would be reasonably expected to occur in the foreseeable future" is difficult at best for a policy-level document such as this City of Villages (COV) EIR which addressed a growth strategy that results in no direct land use change and no specific location siting, to determine. Unlike analysis for a development, it can not be assumed that all potential villages/corridors could or would be built upon the approval of this proposed strategy; its implementation is phased with subsequent discretionary actions and tiered environmental review; likewise, it can not be assumed that growth allowed by existing plans would occur first before the proposed redevelopment and infill. The environmental analysis in the distributed DEIR assumed that the proposed 17,000 to 37,000 attached homes along with the allowable units of the existing plans would be built out by the year 2020 because the population forecast showed that there would not be sufficient housing to accommodate the projected population increase; this was the reasonable foreseeable future which was analyzed in the distributed DEIR. Therefore, the "No Project" alternative in the distributed DEIR is the buildout of the existing plans; these current allowed new units will be needed before 2020. In contrast, the proposed strategy may be appropriate for beyond the typical twenty-year, planning horizon. This beyond 2020 scenario is described in the proposed draft Strategic Framework Element.

There are thirteen adopted community plans with existing capacity to add future residential units. If the proposed COV strategy is adopted, the village-type development would compete for future development with the existing, developable residential acreage in these community plans. These developable acreage are mostly underdeveloped areas and some vacant land. The incentives and marketability of the village-type, mixed-use development would need to as a minimum, match the inducement of future development on remaining available land. The demonstrated effectiveness of the mixed use, pilot villages is essential to assure that the implementing village-type redevelopment and infill can compete at least on an even level with the lure of single-type, residential construction on available land.

STAFF RESPONSE Qq-6: The distributed DEIR in the Goals and Objectives section, disclosed the current population and the forecasted population increase as suggested by the commenter.

CEQA Guidelines were followed; refer to previous Staff Response Qq-2. It should be noted that for land use policy analysis such as the proposed strategy to guide future growth and development, the analysis is typically based on housing units rather than population. In terms of environmental analysis, most impacts are caused by or attributed to the resultant housing units. In addition, the proposed strategy would ultimately result in attached homes; this distinction of housing type is essential in the expected product design and effects on traffic, air quality, noise abatement, water quality control, wastewater generation, water useage, and energy consumption. This would be lost if the focus of the analysis is simply based on accommodated population as the commenter appears to suggest.

STAFF RESPONSE Qq-7: The commenter is incorrect; the discussion of regional setting and regional impacts is adequate. Regional setting and impacts were addressed in traffic, air quality, wastewater, potable water, and MSCP (land use) sections of the distributed DEIR. Refer to previous Staff Responses Qq-3 and Qq-4.

STAFF RESPONSE Qq-8: The proposed 5-Year Action Plan is the implementation program of the proposed Strategic Framework Element; it sets up the process of updating the other elements of the City's Progress Guide and General Plan, amending community plans, and identifying other steps necessary to implement the proposed City of Villages Strategy. It is covered by this EIR because it would be considered for adoption by the City Council concurrently with the proposed Element.

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March 5, 2002

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CITY OF SAN DIEGO
MAR 12 2002
PLANNING DEPARTMENT

Subject: Draft Environmental Impact Report (LDR EIR No. 40-1027) for the City of San Diego Strategic Framework Element - City of Villages Strategy (COV)

This letter relates to the subject DEIR references to the Centre City redevelopment area. My comments are in my capacity as a member of the Centre City Advisory Committee (CCAC), the community planning group for the 1500-acre downtown redevelopment area.

- DEIR Distribution List. Neither the Centre City Advisory Committee (CCAC) nor the Centre City Project Area Committee (PAC) was included in the DEIR distribution list. The CCAC, previously the PAC, is the community planning group for the Centre City plan area. Please add the CCAC to your distribution list and send the notices and materials to me at the above address.

Qq-9

Neither the Centre City Development Corporation (CCDC) Board nor CCDC staff is listed on the DEIR Distribution List. As the DEIR on page III-1 states "Downtown San Diego, the Centre City, would remain the regional center..." it appears a significant oversight not to include CCDC on the DEIR Distribution List.

Qq-10

- NOP DEIR Distribution List. Not one of the following are on the NOP DEIR Distribution List: CCDC Board, CCDC staff, and the Centre City PAC. (The CCAC did not exist at the time of the NOP.) It is not surprising that none of the above submitted responses to the NOP. It is unfortunate, however, because the DEIR would have gained from their input.

Qq-11

- Cited reference materials. It appears that the referenced materials for the Centre City area are not the latest versions. The cited materials are: the CCDC Master EIR for Centre City Redevelopment, April, 1992 (DEIR page IX-1), the Centre City Community Plan, no date given (DEIR page IX-2); Centre City CP, 7/90 w/corrections 9/90, Centre City-Urban Design Program, no date given, Centre City SD Development & Design Ordinance, no date given (Attachments: Community Plans/Local Coastal Programs, pages 1-3).

STAFF RESPONSE Qq-9: The attached distribution list to the DEIR is the official Environmental Analysis Section (EAS) list of all interested jurisdictions, agencies, organizations, community groups, and persons who usually receive City-prepared CEQA document for review. For this distributed DEIR, all listed entities who were sent copies of the DEIR included not only those included on the EAS list but also those on the list of entities interested in the Strategic Framework Element planning effort; this distribution list included the executive director and a planner at CCDC. It would have been a significant oversight not to send a copy of the DEIR to CCDC; it was not a significant oversight to not list CCDC on the distribution list.

STAFF RESPONSE Qq-10: As with the distribution of the DEIR, while not listed on the NOP, CCDC was sent copies of the NOP. In addition, the commenter was personally given a copy of the NOP during its public review period at a Combined Planner Committee meeting

STAFF RESPONSE Qq-11: Of the cited documents, the CCDC Master EIR was used in the analysis of the distributed DEIR; this 1992 Master EIR has been relied upon by CCDC for site-specific development with written confirmation that the specific project was covered adequately by this Master EIR.

Qq-12

DEIR page III-1: "Opportunities to further increase employment intensities and residential densities in the Centre City to take advantage of its many amenities, would be considered."

DEIR page III-2: "The proposed City of Villages strategy encourages the further intensification of downtown to increase its role as a regional hub. An important goal is for Downtown to enhance its role as the pre-eminent business center in this region and intensify its emergence as major urban residential center with higher density residential uses and mixed-use development."

DEIR page III-2: "Downtown's unique attributes should be capitalized to create the largest concentration of medium to high density housing in the region and a much expanded office district."

Residential. The partnership of the private sector and CCDC has been successful in creating an attractive residential community downtown. Higher residential density has been happening because there is currently a market for it. But once this density translates into a strong residential population, then the residents (who are voters) will want to ensure that their community remains attractive and includes desired amenities. The City of Villages strategy will not be able to force higher residential density on downtown if the market is not there.

Qq-13

Office. City policies have put the downtown office market at a disadvantage. City policies have allowed the growth of competing office centers with free parking. If the City of Villages strategy is to "enhance [downtown in] its role as the pre-eminent business center," then the City has to address the market forces which are causing decision makers to choose other locations for their offices.

Qq-14

There is no evidence that the City of Villages Strategy has a strategy for dealing with the private market forces which ultimately make development happen.

Qq-15

A Comprehensive Strategy (DEIR pages III-6 and 7). The Strategy sounds more like a vision and goals than a strategy.

Sincerely,



Ann T. Fathy, AICP

cc: Gail Goldberg
Joyce Summer

STAFF RESPONSE Qq-12: Comments noted. It should be noted that while market forces must always be considered, it can not be permitted to be the only driving force to shape the form of the City. Long term planning such as the proposed strategy, is needed to as a minimum, to guide orderly growth and development such that desired urban form is realized, public amenities are achieved and a sense of community is retained.

STAFF RESPONSE Qq-13: Comments noted; these comments do not address the adequacy of the distributed DEIR. The proposed strategy is a twenty-year and beyond plan; at some point when developable land is gone in the City and is diminished in the surrounding jurisdictions, land would become too valuable to be used to provide free parking. At the onset of this condition, open parking areas would be infilled pursuant to the proposed strategy, and in the future, limited parking would occur in centralized commercial parking structures.

STAFF RESPONSE Qq-14: Comment noted; this comment does not address the adequacy of the distributed DEIR. Also refer to previous Staff Response Qq-5 (Paragraph 2).

STAFF RESPONSE Qq-15: As stated in the distributed DEIR, the proposed strategy is comprehensive in its scope because it addresses a wide variety of issues and values such as urban form, historic preservation, prosperity, facilities, conservation, mobility, housing affordability, and regional planning. Initially, the proposal is a vision, a citywide direction for additional growth through infill and redevelopment; ultimately, the vision becomes a comprehensive strategy once its implementation is in place to happen through a phased approval process. This implementation process is laid out in the proposed 5-Year Action Plan.

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

CITY OF SAN DIEGO

MAR 29 2002

PLANNING DEPARTMENT

March 24, 2002

Re: Comments, Draft EIR for the City of San Diego Strategic Framework Element.

Dear Ms. Lowry,

This letter is in response to the above Draft EIR. I have the following comments and concerns:

1. The Project Description is even more vague, misleading, prejudicial and inaccurate than when I commented previously in June 2001. Generalized statements are used so that it is impossible to determine what the project is.

1.1 Which "project" is being analyzed?

A 4th draft map dated December 19, 2001 of the Strategic Framework Element City of Villages Map shows "Urban and Neighborhood Villages Centers [sic] and Transit corridors". Urban Village Centers are described as "more intensive employment, residential regional and subregional commercial uses".

What specifically does this mean? For instance, is an "intensive employment" use a factory or a shopping mall? What are the "medium to high density residential uses" proposed? How many units to the acre are proposed? Similar undefined statements are included in the "Neighborhood Village Centers" page III-3 e.g.

Rr-1

- "...community oriented areas..." - What specific land uses are envisioned for these areas?
- "...medium to medium-high range densities of building types..." - What are the densities referred to? Are these residential densities? What is "Medium to medium-high range" density?
- "Residential density and intensity varies according to each centers size, location, surrounding community character..." - What specifically does this mean? Is the document discussing an existing or a proposed community? If this is supposed to indicate proposed land use it is unduly broad for environmental analysis.

Rr-2

The "Project Description" and the Project Map are so loose and unspecific as to allow a huge range of land uses and intensities. How can the environmental impacts of unspecified and wide ranging densities and land uses be analyzed? How can the environmental impacts be assessed if the project is not defined?

Rr-3

Incidentally, the written rationale has not been provided for the selection of the specific sites for proposed land use changes shown on the City of Villages Map.

1.2 Leading statements.

The project description contained in the Draft EIR is so vague and unspecific as to be meaningless. The following summarizing statement is 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" Page III-2.

Rr-4

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?

Rr-5

Robert Green 3571 28th Street, San Diego Ca 92104

STAFF RESPONSE Rr-1: The commenter's seeks precise statements defining future land use plans. The proposed Strategic Framework Element intentionally omits such specificity as the precise boundaries, mix of uses, and intensities of village areas are to be determined during the subsequent community plan update or amendment to implement the proposed City of Villages strategy.

STAFF RESPONSE Rr-2: Refer to previous Staff Response A-1.

STAFF RESPONSE Rr-3: The cited City of Villages map does not select specific sites for proposed land uses; it depicts potential village sites. As stated previously, the proposed strategy to guide future growth and development, does not result in any land use change or site any specific village locations. Refer to previous Staff Response C-4.

STAFF RESPONSE Rr-4: Refer to previous Staff Response A-1.

STAFF RESPONSE Rr-5: Refer to previous Staff Responses B-15. The commenter's cited "145 units/acre" is relevant to Downtown, but this high density is not envisioned by the proposed strategy, anywhere else in the City.

- Rr-6 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?
- Rr-7 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 other communities 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 accommodating thousands of new residents). To claim otherwise is, to put it mildly, misguided.
- 1.3 Misleading statements.
The term "City of Villages" is used to describe the proposals. The document fails to clearly define what a "Village" is. 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.
- Rr-9 The Project Description also notes that "the element has been termed "A City of Villages". For this analysis, the terms, "the proposal", "The City of Villages", "SFE", or simply "the strategy" are synonymous with the proposed project" page III-I.
The document now has four different names for the "Strategic Framework Element". This array of descriptors confusing.
2. Land Use Consistency.
The "Conclusions" section notes that "The City of Villages strategy proposes changes in growth patterns. However the proposed growth strategy would not change the existing general land uses. However there are three corridors in the Draft City of Villages Map which could result in land use intensity, are located in the noise impact area of Lindberg Field. [sic] (Page ii)
The last sentence in this quote is unintelligible. It is not clear what is being proposed. It is not clear what is meant by "...result in land use intensity" or "...general land uses" (please also see above 1.1). What is a "general" land use? Most land uses also have a certain level of intensity. It should be clarified if and where land use is proposed to be intensified and if and where land uses are proposed to be changed. Only then can the environmental impacts be evaluated.
- Rr-11 This paragraph goes on to state that "...inconsistency/conflict with the environmental goals, objectives or guidelines of a community plan or the General Plan would be considered a significant Land Use Impact.
If it cannot be determined clearly what the land use proposals are, how can it be established whether there is an "Environmental Impact"?
- Rr-12 The Draft EIR claims the "intent" of current community plans would be retained and that no "land use impact" will result. The document also notes that if the existing City land use legislation is made consistent with the Strategic Framework Element" the proposed growth policy would not pose a significant land use impact" (page ii) Although the Draft EIR and the "Strategic Framework Element" does not clearly specify details, sweeping changes to land use and dramatic land use intensification seem to be proposed by the stated goal of the plan to accommodate 17000-37000

STAFF RESPONSE Rr-6: The commenter's assumption is incorrect. The distributed DEIR did not determine that there will be no effect on the quality of life; the DEIR did determine significant and unmitigated impacts to regional traffic congestion and air quality. These two unresolved issues are key factors to the quality of life. The expressed intent of the proposed City of Villages strategy is enhancing the quality of life; to this effect, the proposed Strategic Framework Element contains core values. Refer to previous Staff Responses B-15 and B-82.

STAFF RESPONSE Rr-7: The commenter's sweeping statement that there would be "huge" density increases in other communities is incorrect. Overall, the potential 17,000 to 37,000 attached units to the projected 480,000 total dwelling units in year 2020 is not a huge increase, and besides Downtown and Mission Valley, the other communities' ultimate additional yield of potential attached units if the proposed strategy is subsequently implemented, can not be characterized as a "huge" increase in density. In addition, some communities show little or no potential density increases because their existing community plans already allow intensification to occur in a manner consistent with the proposed City of Villages strategy..

STAFF RESPONSE Rr-8: The more relevant definition of a "village" as it relates to the proposed strategy is given in Webster's 3rd New International Dictionary (1971); this dictionary defines village as "a section or district of a larger municipality (as a city) having characteristics that set it apart as an individual unit resembling a village (i.e. Greenwich in New York)".

Contrary to commenter's cited "145 units/acre", the proposed strategy envisions no potential village at this high cited density anywhere in the City outside of downtown. The commenter's assertion that "the description in Notice of Preparation (sic) is misleading and inaccurate " is unsubstantiated and appears out of place in commenting on the DEIR. Refer to previous Staff Response B-2.

STAFF RESPONSE Rr-9: The commenter is correct; the proposed project, the proposal addressed in the distributed DEIR, is the proposed Strategic Framework Element (SFE) which in turn, comprises the proposed City of Villages strategy to guide future growth and development. There are subtle nuances in the meaning of these terms, but these names (not "descriptors") for the proposed project, can generally be used interchangeable to somewhat reduce the inherent monotony of the environmental document text.

STAFF RESPONSE Rr-10: The key word, not included in the commenter's request for clarification is "could". The proposed project, the Strategic Framework Element/City of Villages Strategy, the strategy to guide future growth and development, does not result in any land use change or site any village locations; However its ultimate implementation by subsequent community plan amendments or updates could ultimately result in land use intensity.

STAFF RESPONSE Rr-11: General land uses include single-family residential, multi-family residential, retail commercial, heavy commercial, office, industrial, manufacturing, and research; the intensity of these land uses are determined by their implementing zones. The distributed DEIR addressed a proposal which allowed the consideration of a solely policy level direction to guide future growth and development in compact, mixed use villages. The EIR is in compliance with CEQA which dictates that environmental review occur at the earliest stage of a project; this initial stage addressed by this program-level EIR is the City Council consideration to provide direction to proceed with the implementation of the proposed Strategic Framework Element/City of Villages strategy through the concurrent adoption of the 5-Year Action Plan.

STAFF RESPONSE Rr-12: The commenter's "sweeping changes to land use and dramatic land use intensification" is a gross exaggeration of the proposed project. The Strategic Framework Element/City of Villages Strategy, the strategy to guide future growth and development, does not result in any land use change or site any village locations. Refer to previous Staff Response Rr-3, Rr-5, Rr-7, Rr-8, Rr 10 and Rr-11. In addition, potential existing village areas make up less than 5% of the City's land area.

- new dwellings. Community plans would need to be amended to accommodate the land use changes.
Merely ensuring that the Legislation is consistent is not sufficient to satisfy CEQA. Land use change impacts must be analysed.
- Rr-13 It is not clear what legislative relationship "Strategic Framework Element" has to the City Land Use Element and Community Plans i.e. does the "Strategic Framework Element" supcede the Land Use Element? Will the Land Use Element be required to be consistent with the "Strategic Framework Element"? If so when?
The environmental impacts of these policy issues need to be assessed.
3. I.O.D?
- Rr-14 Reference is again made to Transit Oriented Development; "...the proposal includes...the application of Transit Oriented Development....". No clear explanation is given for this term. This item must be clarified and analyzed pursuant to CEQA.
4. Infrastructure analysis
- Rr-15 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
- Rr-16 The Traffic analysis section is inadequate. The macro environmental impacts of the proposal are not examined. The Conclusions - Transportation (page iii) notes that the projects traffic environmental impact would be "significant" but further analysis is deferred to some vague unspecified point in the future: "as subsequent implementing discretionary actions are required...more specific traffic analysis would be required". (page iii). This approach defers the analysis of policy level land use and regional transportation network actions to the project specific level. It ignores the responsibility the City has for conducting Environmental Review on policy actions which may have citywide and regionwide environmental impacts. Mitigation must be proposed or this item must be declared unmitigable and a Statement of Overriding Considerations must be adopted.
\$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?
- Rr-17 This approach also ignores any fatal flaws that there may be in the strategy and defers the "discovery" of such flaws to the point of specific project approval thereby exposing the City to the liability of lawsuits from disgruntled developers.
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 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.
- Rr-18 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
- Rr-19

Robert Green 3571 28th Street, San Diego Ca 92104

STAFF RESPONSE Rr-13: Currently the City's adopted community plans constitute the land use element of the General Plan. State law requires internal consistency among all elements of the general plan. The proposed 5-Year Action Plan lays out a plan to ensure that all general plan elements, including the community plans, are consistent with the proposed Strategic Framework Element. The proposed Element will form the basis for analysis for each subsequent community plan amendment or update. In addition, a new Land Use Element is envisioned as part of this General Plan Update effort to provide guidance for the preparation of community plans, and to avoid duplication with the General Plan. Also refer to previous Staff Response A-5.

STAFF RESPONSE Rr-14: Refer to previous Staff Response B-20.

STAFF RESPONSE Rr-15: The commenter is incorrect; the distributed DEIR addressed impacts of allowed growth and the additional potential impact caused by the proposed City of Villages in the year 2020 for the commenter's cited water, sewer, and "garbage dumps"; it was determined that there were sufficient water supply and sewer capacity to serve growth and the project through 2020. The landfill capacity in the year 2020 currently at best, is questionable after year 2015.

STAFF RESPONSE Rr-16: Refer to previous Staff Response B-33. As stated previously, this EIR allows the consideration of a growth policy to allow additional attached units into mixed use redevelopment and infill areas. A Statement of Overriding Considerations (SOC) is needed for approval of this strategy, and a draft (SOC) is attached to this Final EIR.

STAFF RESPONSE Rr-17: The commenter's "fatal flaws" have been identified and disclosed as potential significant and unmitigated impacts in the distributed DEIR and the funding shortfall, existing facilities needs, and possible solutions have been addressed and disclosed in a separate planning document. Refer to previous Staff Response B-34.

STAFF RESPONSE Rr-18: The deferring of community-level traffic analysis is appropriate and consistent with CEQA Guidelines Section 15146, because it has clearly been stated that there would be more specific environmental review including a more detailed traffic study required for subsequent, implementing community plan updates and amendments.

STAFF RESPONSE Rr-19: Refer to previous Staff Responses Rr-18 and also to A-10.

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?

Rr-20 | 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?

Rr-21 | 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" ?

Water

Rr-22 | The analysis is incomplete. The projected water requirements are included, but not the anticipated supply. Vague statements are made about redevelopment replacing existing development which "most likely is not water efficient" and conclusory statements are made that "new attached homes...built in villages or corridors ...would use less water than single family homes". No evidence is provided to support these claims. Further it is not documented that the proposed development will replace "single family homes".

Rr-23 | Inaccuracies are contained in the document. For instance table G.1 referred to on Page IV – 69 appears to really be table H.1.

Rr-24 | 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? What will the City and Regional water supply versus demand be in 2020? Only City of San Diego impacts are currently discussed.

Solid waste.

Rr-25 | 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. The Conclusions –Solid Waste Disposal section notes that the Environmental Impacts on this issue were significant and not mitigated based on the inability of current land fills to handle projected waste "let alone, accommodate the additional refuse expected to be generated by the project's resultant potential yield..." (page iv).

Rr-26 | The EIR merely proposes to "monitor" the situation. The analysis in the EIR indicates that the waste from the project cannot be accommodated and that Significant Environmental Impacts will result. It is not sufficient for the City to merely sit by and watch its prediction of a significantly adverse Environmental Impact materialize. Mitigation must be proposed or this item must be declared unmitigable and a Statement of Overriding Considerations must be adopted. Again, this approach ignores any fatal flaws that there may be in the strategy and defers the "discovery" of such flaws to the point of specific project approval thereby exposing the City to more liability of lawsuits from disgruntled developers.

Rr-27 | There should be a comprehensive discussion of these issues and all other regionwide infrastructure issues in the Project Description and EIR.

5.
Rr-28 | 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

STAFF RESPONSE Rr-20: The commenter is incorrect; the 4th draft City of Villages map included in the distributed DEIR did not show any potential density increases along University Avenue and El Cajon Boulevard.

STAFF RESPONSE Rr-21: The existing transit corridors are the optimum transit corridors for the type of redevelopment and infill envisioned by the proposed City of Villages strategy. These corridors are generally along wide streets with existing commercial uses which could redevelop with an added mixed use residential component; the simplest design would be apartments over a first level retail store. Mixed use intensification means added attached housing units into an existing commercial area with increased floor area ratios to, as a minimum, retain the level of commercial uses in a potential village or corridor

STAFF RESPONSE Rr-22: The referenced/attached County Water Authority (CWA) report in the distributed DEIR, determined (based on SANDAG's 2020 population forecast) that its service area would need 813,000 acre-feet of potable water in the year 2020 and that project supplies could meet this demand. The less water use by an attached unit versus a detached unit was not a conclusory statement. For instance, the DEIR stated that the attached units have less landscaping which require less irrigation and disclosed findings by the City Water Department which showed a growing difference in water usage between attached and detached units. The commenter may have been confused by the typographical errors which stated "detached" when it should have been "attached"; these errors have been corrected in the Final EIR text.

STAFF RESPONSE Rr-23: The cited "inaccuracies" in table labeling has been corrected. Incorrect table labeling does not affect the impact analysis of the distributed DEIR and does not affect its adequacy.

STAFF RESPONSE Rr-24: Refer to previous Staff Response Rr-22. "Toilet to tap" is not one of the supplies cited by CWA to meet the regional water demand in year 2020. The commenter is incorrect; the distributed DEIR addressed both regional and city impacts/needs.

STAFF RESPONSE Rr-25: The distributed DEIR addressed energy needs and did determine that impacts to solid waste disposal capacity is significant and unmitigated at this time.

STAFF RESPONSE Rr-26: Refer to previous Staff Response B-18. The distributed DEIR did determine that impacts to solid waste disposal capacity is significant and unmitigated at this time, a draft Statement of Overriding Considerations is attached to this Final EIR.

STAFF RESPONSE Rr-27: Refer to the staff conclusions for a summary of the impact analysis and previous Staff Responses Qq-3 and Qq-4.

STAFF RESPONSE Rr-28: At this solely policy-level analysis, it is the appropriate level of detail in the project description of the EIR; it should be termed "conceptual" rather than the commenter's suggested "vague". Refer to previous Staff Response B-34.

standards". What specifically are the policies and what subsequently will be the environmental impacts of the various funding policies?

- Rr-29 6. 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?
- Rr-30 7. 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.
- Rr-31 8. 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?
- Rr-32 9. 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.
- Rr-33 10. 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.
- Rr-34 11. 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. 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".
- Rr-35 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.

STAFF RESPONSE Rr-29: Refer to previous Staff Responses B-34 and B-62. It should be noted that fee-funded infrastructure such as water and sewer system upgrades are planned and would be implemented in all needed areas. Other infrastructure repairs and/or improvements are less certain and would be improved when funds become available.

STAFF RESPONSE Rr-30: Refer to previous Staff Response Bb-6.

STAFF RESPONSE Rr-31: The level of detail regarding increased FAR would be determined on a case-by-case basis as community plans are subsequently updated or amended to implement the proposed City of Villages strategy. These subsequent actions would require further environmental review when densities, intensities, and locations are defined.

STAFF RESPONSE Rr-32: Refer to previous Staff Response B-3 (Paragraph 2)

STAFF RESPONSE Rr-33: Refer to previous Staff Responses B-5 , Z-5, and Z-10.

STAFF RESPONSE Rr-34: Comments noted. Refer to previous Staff Response B-20. The commenter is incorrect; the map depicts potential villages, but does not include "site specific proposals" as the commenter asserts. The map is not a land use land. Refer to previous Staff Response B-5.

STAFF RESPONSE Rr-35: It is unclear what policies or goals included in the proposed Strategic Framework Element "seems to contain site-specific proposals and implementation measures" as asserted by the commenter. The proposed Element contains certain design features that should be applied to future, village-type development, but it is not the vehicle with which specific villages can be located. The proposed Element is a proposed policy statement that applies citywide; it can not contain "site specific proposals".

Anne Lowry
Page 6.
March 24, 2002

Rr-36

As also noted above the proposed Draft 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.
What legislative status does this "City of Villages Map" have?

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

STAFF RESPONSE Rr-36: The distributed DEIR as it relates to the subject regional scope of the proposed project, a proposed strategy to guide future growth and development without any land use change, has been prepared to be consistent with CEQA and City guidelines. All CEQA-mandated procedural process has been followed in its preparation, noticing, distribution, and finalization. This Strategic Framework Element/City of Villages EIR is an adequate CEQA document and can be referenced in subsequent CEQA documents prepared to implement the proposed strategy. Refer to previous Staff Response Rr-34.

5055 Mt. Frissell Drive
San Diego, CA 92117
February 18, 2002

CITY OF SAN DIEGO
FEB 26 2002
PLANNING DEPARTMENT

Mr. Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Department
City of San Diego
1222 First Avenue, M.S.501
San Diego, CA 92101

Subject: SCHOOLS: City of Villages Growth Strategy and Strategic Framework DEIR

Dear Mr. Monserrate,

Ss-1 As chairperson of the Clairemont Town Council's Education Committee, a member of the Focus On Clairemont Schools Committee and a participant in the SDUSD-sponsored Clairemont Secondary Schools Study, as well as a longtime Clairemont resident and parent, I know the tremendous impact and importance schools have, not only on individual children and families, but on the community as well. It was most surprising, therefore, to have schools listed under "Effects Found Not To Be Significant" in your DEIR of January 11, 2002, and dismissed with a single paragraph.

Ss-2 Your Memorandum of June 4, 2001, describing the scope of the work to be done regarding schools for the DEIR, called for an analysis of the compatibility of the proposed project with existing adopted school facility plan, as well as the net effect of density increases in areas targeted for urban villages and/or underutilized TOD corridors. Where are these matters addressed in the DEIR in relation to increased school enrollment? It would also be important to include a copy of the "existing adopted school facility plan" so that it could be compared to your map showing the areas proposed for TOD or urban or neighborhood villages. The funding source for building or upgrading schools must also be identified and included.

Ss-3 In the MANDATORY DISCUSSION AREAS of the DEIR, the schools are grouped under a heading of Section B, titled Effects Not Found To Be Significant. Where was this discussion held? Who were the participants? Was a wide range of community stakeholders involved? Was it a public discussion? If Planning Department personnel and School District personnel were merely speaking to each other in vague terms of trusting one another to plan ahead, with no input from community stakeholders, and without addressing the environmental and financial issues above, that is not satisfactory. Mr. John Kovac and Ms. Mary Wright of your department have not been able to provide this information to date, but I am hopeful it will be forthcoming.

STAFF RESPONSE Ss-1: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-2: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-3: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-4: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-5: Refer to Staff Responses B-58 and B-59.

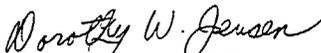
STAFF RESPONSE Ss-6: Refer to Staff Responses B-58 and B-59.

Ss-4 In the DEIR, Section VII-B, they say the proposed City of Villages strategy could potentially result in an additional 17,000 attached homes, "... much of it in the area served by the San Diego Unified School District." The paragraph further states "... inadequate and over burdened facilities are a result of jurisdictions that do not utilize long-terms plans and as a result react to the current needs rather than future needs." Unhappily, this latter phrase is an accurate description of the performance of the San Diego Unified School District, as exemplified by the many extremely overcrowded schools now in the District, the years-long neglect of maintenance and upgrading which necessitated the proposition MM bond issue, and the flight of families out of the District or to private schools. Rather than a dismissal as not significant, or a vague phrase stating "...school districts would plan and provide school related facilities to meet the future education needs..." the importance of a true analysis of the environmental impacts of increased density on our schools is essential to the City of Villages Plan, along with identifying the funds to meet these needs.

Ss-5 Right now, the School District is still playing catch-up with our past and present population growth, and they are far behind. It is even admitted that they will have insufficient funds to finish this work-- needed yesterday! It seems imperative, therefore, that the impact of still greater increased density as it relates to schools be identified in this DEIR report. Children's education and neighborhoods cannot wait until a school district raises money or sponsors bond issues to build or upgrade the proper schools. Rather, it must be an integral pre-planned part of our Strategic Framework City of Villages Growth Strategy. A greater population in a community's schools WILL IMPACT traffic, libraries, parks and recreation facilities. It WILL IMPACT neighborhood character and quality of life for better or for worse, and it WILL IMPACT our present neighborhood schools. Proper planning NOW could make sure these impacts will be positive. Ignoring them NOW will assure that more and more people will flee to other areas of the County...adding to the very sprawl which the Strategic Plan hopes to deter.

Ss-6 Please readdress your "no impact" policy about our schools in your DEIR and order a true analysis of the environmental impact and the mitigation and funding needs which densification will bring to our schools. We can accept greater densification in our neighborhoods when done properly, but we cannot accept this unrealistic evasion of future impact. The effect of schools on our neighborhoods and communities is too important to dismiss in one paragraph of platitudes.

Yours truly,


Dorothy W. Jensen, 858-277-7527

Cc: Mayor Dick Murphy

STAFF RESPONSE Ss-1: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-2: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-3: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-4: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-5: Refer to Staff Responses B-58 and B-59.

STAFF RESPONSE Ss-6: Refer to Staff Responses B-58 and B-59.

5055 Mt. Frissell Drive
San Diego, CA
March 26, 2002

Mr. Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Department
CITY OF SAN DIEGO
1222 First Avenue, M.S. 501
San Diego, CA 92101

CITY OF SAN DIEGO
MAR 29 2002
PLANNING DEPARTMENT

Subject: City of Villages Growth Strategy and Strategy Framework Element DEIR

Dear Mr. Monserrate,

Ss-7 I would like to bring your attention to the fact that the issue of noise has not been addressed in the Draft EIR, even though the NOP /Scoping Letter (page 9) stated "Will the proposal result in a significant increase in the existing ambient noise levels?" Increased commercial and multi-family development on these sites can only add to the burden of noise and needs a more thorough study.

Ss-8 Although I live over one-half mile from the proposed Urban/Neighborhood Villages at Balboa and Genesee Avenues, the noise now coming from some of these centers already impacts me with late night or 5 a.m. beeping of fork lifts and sweepers and the early morning noise of trash pickups. Those R-1 homes and the multi-family apartments which are even closer than my own to these centers presently bear an even greater burden on their quality of life because of noise pollution.

Ss-9 The manager of Sun N Dale Apartments on Balboa Arms Drive has told our Clairemont Apartment Managers Group repeatedly that she has two apartments which are impossible to keep rented because of the noise coming from the commercial area across the street. When you add commercial stores to these centers, with living spaces above, it is a concern that you will just add to the stock of "unlivable" units.

Ss-10 Please take the issue of noise seriously and address it with specific mitigation recommendations, not vague dreams that "the noise attenuating site design features for residential uses can be more easily accomplished with a mixed use development" as stated on page IV-58 of the DEIR. What does that mean, and how does that statement actually address noise issues?

Thank you for considering my request to address the serious impact of noise issues in your final EIR.

Cc: Mayor Dick Murphy
Councilmember Donna Frye

Sincerely,


Dorothy Jensen
858-277-7527

STAFF RESPONSE Ss-7: Refer to Staff Responses B-46, B-47, and B-48.

STAFF RESPONSE Ss-8: Refer to Staff Responses B-46, B-47, and B-48.

STAFF RESPONSE Ss-9: Refer to Staff Responses B-46, B-47, and B-48.

STAFF RESPONSE Ss-10: Refer to Staff Responses B-46, B-47, and B-48.

Anne Lowry, Senior Planner
Environmental Analysis Section
Development Services Department
City of San Diego
1222 1st Avenue, Mail station 501
San Diego, CA 92101

PLANNING DEPARTMENT
MAR 29 2002

Re: City of Villages Environmental Impact Statement

Dear Ms. Lowry,

On behalf of the University of San Diego Environmental Law Clinic, I submit the following comments to the Environmental Impact Report ("EIR") for the City of Villages plan (the "Plan"):

General Comments

It appears that there will be no serious planning cooperation with communities adjacent to San Diego. This is significant because these other communities, with their own planning mechanisms, could severely lessen the impact of the Project by implementing poor planning. For example, if another city was developed to create a population center that attracted residents from San Diego to commute for employment, recreation, etc., then taken as a whole, this may be actually increasing car trips from San Diego and contribute to congestion within the City. This could defeat the Project's goal of limiting car trips and creating village centers in which people can meet their needs on a highly localized basis. This problem could be at its worst at the margins of the City.

Solid Waste

It is unclear from the Draft Environmental Impact Report that there are any plans to accommodate our growing solid waste needs. The Report mentions that San Diego could see an increase in 17,000 to 37,000 attached homes, generating 20,000 to 40,000 tons of waste on an annual basis. Although there is a private landfill that may serve the City, it is uncertain that this will be appropriate to solve the problem. Additionally, there is no

STAFF RESPONSE Tt-1: Refer to the distributed DEIR pages VI-2 and VI-3. Also, refer to previous Staff Responses B-2 (paragraph 2), B-10, B-36, and B-37.

The proposed City of Villages is closely linked with the Metropolitan Transit Development Board's (MTDB) Transit First plan. MTDB developed the Transit First plan to outline a network of new transit services with increased convenience, comfort, security and speed. It's a plan to make transit an attractive first choice for everyday trips by the year 2020. The Transit First plan and the City of Villages are mutually dependent in that the proposed transit improvements and land use planning must be implemented concurrently to assure their mutual success.

The distributed DEIR addressed the initial phase of the proposed City of Villages project, the adoption of the proposed Strategic Framework Element and 5-Year Action Plan. The future planning and implementation of the City of Villages strategy (such as future community plan updates, amendments, and other discretionary permits) would be accompanied by future CEQA review and analysis.

STAFF RESPONSE Tt-2: Comment noted. Possible solutions for future solid waste disposal being considered include export, land fill expansion and increased private land use capacity. Recently with citywide recycling efforts, the amount of refuse buried has been steadily decreasing. This decrease is due to recycling efforts by the City's Environmental Services Department in attempting to comply with Assembly Bill 939 (1989) that required all cities and counties to reduce the amount of refuse land filled by 50% (of the 1990 baseline total).

Additionally, the proposed Strategic Framework Element includes a set of policies for resource protection, pollution prevention, green land development principles, environmental equity, and education. The proposed 5-Year Action Plan recommends a complete update of the Conservation Element to address resource protection, pollution prevention, storm water and urban runoff, land development, social equity, and education. The Action Plan also recommends adopting an Energy Element into the Progress Guide and General Plan, and reviewing existing policies, regulations, and programs in order to improve natural resource protection and conservation.

Tt-1

Tt-2

active citing effort occurring in the City. Given the increase in solid waste, and the uncertainty that there will be sufficient means to dispose of our waste, the City has chosen to increase its recycling efforts to curb the problem. Is this adequate? What is lacking here is an adequate survey of the recycling programs proposed, and their effectiveness. Additional questions remain unanswered: will the City's Solid Waste Department be expanded to meet the growing demand for waste disposal? Do the private contractors that collect garbage for the City have the capacity to expand? It is our belief without citing additional landfills, without an aggressive recycling program, and without any plans for expanding our City services, the City's solid waste problem will not go away, but will grow to be a big problem for the City in the future.

STAFF RESPONSE Tt-3: Please refer to previous Staff Responses B-10 and B-33.

Transportation and Air Quality

The Report states the City is likely to see a vast increase in the car trips residents will take, ranging from 180,000 to 240,000 additional trips. The City's expanded public transit system and increased walking will only mitigate traffic by six percent. While the need still exists for more specific and continuing traffic analysis, it is safe to say that we will be facing a major traffic crisis in the next 20 years. There is no mention in the plan of how we can mitigate the remaining 94% increase in traffic. In light of this, one can assume that the City will respond reactively to the traffic in the City, instead of proactively. An aggressive system of commuting incentives needs to be in place before the City of Villages Project is implemented. For example, the City should consider designing a program to offer employers highly attractive incentives to assist their employees in using alternative means of commuting. The City should consider drafting

Tt-3

guidelines to aid employers in these goals. The way it stands now, the City will not develop any serious traffic reduction programs until they are forced to because of debilitating traffic, at which point it may be too late to affect any real change.

Tt-4

The Report likewise states that the Project's air quality impact remains significant and unmitigated. The solution to this, as stated in the Report, is regional planning. However, the Report does not go into much detail about what this regional effort will be. As mentioned before, without a strong regional planning authority with realistic goals and means for smart regional planning, we can expect to see a significant deterioration in air quality, increase in congestion, and decline in the aesthetic value of our community. This regional authority should be in place and active before the Project is implemented.

D. Paleontological Resources

Tt-5

Considering the significant impact to these resources caused by subterranean parking garages, please consider the alternative of reducing the amount of parking space. To make the Villages more environmentally friendly, the residents should be encouraged to use mass transit, as well as biking and walking. Reducing the available garage space will reduce the impact on paleontological resources and mitigate the innumerable environmental impacts of additional cars in San Diego, both on a local level (such as traffic, noise and air quality) and a regional level (such as available land space in the county, since there are eight parking spaces for every car in the United States).

STAFF RESPONSE Tt-4: Refer to previous Staff Responses B-44 and B-45.

STAFF RESPONSE Tt-5: Refer to previous Staff Responses B-2 (paragraph2) and B-10. Additionally, please refer to the distributed DEIR pg. IV-51 which states that "Once a subsequent development is subject to CEQA environmental review, the initial study would identify whether it is likely that potential subsurface, fossil resources are present on the site. If there is a moderate or higher potential for fossils to be present on a particular site, monitoring for paleontological resources is required during grading in order to mitigate potential significant impacts."

F. Noise.

Tt-6

The analysis of noise was unnecessarily limited to a determination of (i) whether the Villages would expose people to noise in excess of the City's noise ordinance and (ii) whether transportation noise would exceed standards established Transportation Element of the General Plan. Even the definition of noise was extremely limited as being "unwanted sound" which causes "disruption of speech communication .. and disturbance of sleep or rest." Webster's dictionary defines "noise" as a much broader concept.

Tt-7

Such a limited analysis fails to consider the most obvious impacts on the human environment caused by concentrating human density. The EIR fails to consider such noise as the ignition of a motorcycle, children playing in a park, a neighbor's music and a variety of other disturbing clatter, which may or may not disrupt sleep. The exceedingly restricted analysis of Noise impacts reflects poorly on the efforts of the City to consider the quality of the human environment within a Village.

G. Storm Water/ Water Quality

Tt-8

The discussion of storm water and nonpoint source water pollution does not provide any specifics as to how additional runoff from construction and additional pollutants from extra automobiles will be treated. This section provides a lengthy discussion of the Clean Water Act ("CWA") statutory regime and a summary of San Diego County's regulatory structure to implement the CWA requirements. However, the section provides no substantive description of the physical procedures that will be implemented to address the construction runoff or the additional grease and oil from extra cars.

STAFF RESPONSE Tt-6: Refer to previous Staff Responses B-46, B-47, and B-48. Also please refer the distributed DEIR pg. IV-58: "The proposed City of Villages strategy would ultimately result in mixed-use residential and moderate to high density residential units. All resultant residential units would be attached, multi-family and would be reviewed for noise impacts whether they are subject to discretionary review or not; they would be reviewed for noise ordinance compliance at the time of the issuance of building permits."

STAFF RESPONSE Tt-7: Refer to Staff Response Tt-6.

STAFF RESPONSE Tt-8: Refer to Staff Response B-2 and distributed DEIR page I-13 which states that "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."

L. Solid Waste Disposal

Tt-9

This section fails to consider the alternative of reducing demolition of existing structures and focusing on restoration of such structures. Such a policy favoring refurbishment rather than demolition would reduce the amount of solid waste from construction.

GROWTH INDUCEMENT

Tt-10

This section of the DEIS concedes that an environmental effect of the City of Villages strategy will be growth inducement within the City. This is a growth inducement project because this new strategy is going to remove obstacles to additional growth that were in place in the previous general plan, and therefore higher density growth is going to be allowed in certain areas. In fact, the DEIS projects that "the proposed City of Villages strategy could ultimately result in an estimated 17,000 to 37,000 additional attached homes to the urbanized core within the City." (DEIS, VI-3).

Tt-11

There is minimal discussion of the growth inducement effect of the new strategy. The DEIS simply states that impact analysis will come at a later time and "would require a succession of subsequent discretionary approvals...the corresponding environmental review would be tiered as the project approaches a site-specific village development with stages of approval and direction with each stage being more specific than the last." (DEIS, V-1). While it is reassuring that impacts will be done on each individual project, the City is making a huge oversight in not creating a growth inducement impact analysis for the growth inducement aspect of the project as a whole.

STAFF RESPONSE Tt-9: Refer to previous Staff Response Tt-2.

STAFF RESPONSE Tt-10: Comment noted. As a point of clarification, the commenter's letter references a "DEIS"(NEPA) in Comments Tt-10 through Tt-15. However, the City of San Diego has prepared an EIR in accordance with CEQA and other relevant City guidelines. A federal NEPA document is not needed; no federal funding or approval is required for this proposed strategy to guide future growth and development.

STAFF RESPONSE Tt-11: Refer to previous Staff Responses B-2 and B-11.

When projecting an additional 17,000-37,000 homes in an already crowded and congested area, to say that the impact will be handled on a project-by-project basis is inadequate. The growth inducement aspect of a single dense residential development might not be significant at all. It is when all the individual projects are put together, that growth inducement becomes a problem. Therefore, the DEIS should be addresses at this point in time, rather than being deferred to a future time. Studies on traffic patterns, parking availability, mass transportation, etc, should be done at the present time, and identify where growth inducement can be tolerated and where it cannot. Failure to complete such assessments now could lead to serious problems later. Additionally, making such assessments on a piecemeal basis will be futile to really understanding the full growth inducement impact of individual projects.

Tt-12

STAFF RESPONSE Tt-12: Refer to previous Staff Responses B-2 and B-11.

STAFF RESPONSE Tt-13: Refer to previous Staff Responses B-2, B-9 and B-10.

STAFF RESPONSE Tt-14: Refer to previous Staff Responses B-2 and B-9 and B-10.

CUMULATIVE EFFECTS

This section of the DEIS deals with the cumulative impacts of the City of Villages strategy. However, this section fails to really address the cumulative impacts of anything in particular. The inclusion of Table VI, which highlights the many past projects done and the mitigated and unmitigated impacts of the projects, is useful in getting a general understanding of the effects of development projects. Unfortunately, the DEIS seems to skirt the issue of addressing this particular mass project strategy by focusing on past projects.

Tt-13

The most specific detail this section gets in discussing projects under the City of Villages strategy is the brief mention that an estimated 17,000-37,000 additional attached homes will be built. A vague range varying by 20,000 homes is not adequate to meet CEQA Guidelines §15130(b), which states that an adequate discussion of cumulative impacts

Tt-14

must include "reasonably anticipated future project producing related or cumulative impacts." Until this is done, it is near impossible to truly evaluate the cumulative effect of the project and this section of the DEIS will be sub-par.

STAFF RESPONSE Tt-15: Refer to previous Staff Responses B-2 and B-11.

Tt-15

Based on the past projects, there were several important environmental issues that were caused and not mitigated, including traffic, biological resources, landform alterations.

The DEIS somehow manages to address these without even mentioning a single proposed project. Until this is done, the DEIS' discussion of these cumulative impacts is useless and misleading.

Respectfully submitted,



David A. King, Esq.

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San Diego, CA 92122
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CITY OF SAN DIEGO
MAR 29 2002
COMMUNITY DEVELOPMENT DEPARTMENT

To: Anne Lowry, Senior Planner
Environmental Analysis Section/City Development Services Department
1222 First Ave.
Mail Station 501
San Diego, CA 92101

From: Deborah Knight
Date: March 25, 2002
Re: Public Comment on Draft EIR for City of Villages

STAFF RESPONSE Uu-1: The distributed DEIR, as a CEQA impact analysis document, did not focus on open space because the proposed project, the Strategic Framework Element and 5-Year Action Plan, continues to preserve open space and the potential villages would be generally located in existing developed areas and was determined not to adversely affect open space.

Protection of open spaces throughout the City is a key objective of the proposed Strategic Framework Element and City of Villages strategy. The strategy is to focus future development on already urbanized node areas (village centers) rather than in existing single-family residential areas or in areas designated for open space. This strategy encourages retaining and strengthening protections for canyons, slopes, wetlands, riparian areas and other natural areas.

STAFF RESPONSE Uu-2: Comments noted. Refer to previous Staff Response Uu-1.

STAFF RESPONSE Uu-3: It is incorrect to state that "absolutely nothing in the document that guaranteed protection" of remaining natural open space. Rose Canyon as well as other urban canyons, east of I-5, are shown on the table in the distributed DEIR, depicting urban canyons within the Multi-Habitat Planning Area (MHPA), the City's planned habitat preserve which implements the adopted Multiple Species Conservation Program (MSCP). In addition, the environmental goal of the University Community Plan which "discourages" development in canyons, was included in Attachment 2 of the distributed DEIR.

Uu-1 | I was pleased to see that under "Core Values" for the City of Villages, the very first one is:
| **Open Space**
| **We value the City's extraordinary setting, defined by its open spaces, natural habitat and unique topography.**

I only wish I saw this high priority on open space reflected in a convincing manner in the Draft EIR. The value seems to disappear into words like "mitigation", implying that rather than protecting and preserving open space, we'll impact it with buildings, roads, noise, etc. and then oh yes, we'll make up for it some other way, some other place.

Uu-2 | My particular concern is open space in natural areas that provide habitat for wildlife. These areas also provide those of us living in an ever more densely populated area the chance to enjoy contact with nature. These areas are irreplaceable.

You can ALWAYS build a road, a building, a place for people to live, work and shop.
You can NEVER build a wild canyon. EVER.

Every bit of wild space you destroy, given how little remains, is a foolish and shortsighted choice. No matter what benefits you foresee in the City of Villages, not one brick of it is worth destroying something you can never ever replace.

Uu-3 | I read the Draft EIR with a particular area in mind, the neighborhood I live in. I saw absolutely nothing in the document that guaranteed protection for the pitifully small remaining natural open space. I saw lots of things that said: well, when we build a road across a natural area, we'll plant some native plants attractively along the edges, or we'll acquire some other land miles and miles away to compensate. I saw things that said, well, we'll squeeze in lots more people and hope that some of them will walk a little

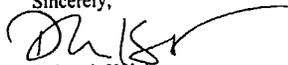
more frequently to some destinations. I saw absolutely nothing that said, we'll make absolutely sure those thousands of more people will not use their cars. I saw nothing that said, we will absolutely not destroy beautiful natural areas. That makes me believe that the City of Villages will create the need for and will then build that big road right across that pitifully small remaining natural habitat, all in total compliance with this Draft EIR.

Uu-4 The natural area I refer to is Rose Canyon in University City. The so-called "Urban Village" I refer to is UTC. And the roads across the natural area I refer to are two in number: one is a four-lane road, Regents Road, which would destroy the last beautiful bit of Rose Canyon. The other road is the widening of Genesee, bisecting Rose Canyon by a six lane rather than a four-lane road. Both would be blessed by this Draft EIR.

Uu-5 That number one core value of "Open Space" OUGHT to protect a place like Rose Canyon. Yet the Draft EIR would permit a massive new influx of development at UTC (call it what you will, the UTC "City of Villages" project is a massive new development). It would NOT protect this irreplaceable natural open space. Therefore I find the EIR totally inadequate in addressing the number one core value of open space.

Uu-6 You can throw away your number one core value and stop pretending. Or you can substantially change the EIR so that the number one core value of open space is reflected forcefully, clearly, and as a top priority. Given the development pressures in our city, City of Villages cannot honor the core value of open space unless you place open space front and center and then work your development around it. This EIR does it the other way around: it places development front and center and then tries to squirm around the issue of all the impacts that will occur on open space.

Sincerely,


Deborah Knight

STAFF RESPONSE Uu-4: The roadways referred to (Genesee Ave. and Regents Road) have been designated roads in the University Community Plan since the 1970's. No suggestions in the proposed Strategic Framework Element or City of Villages strategy would change the planned/adopted status of those circulation element roads. Reconsideration of the need for the planned four-lane Regents Road bridge across Rose Canyon and widening Genesee Avenue to its planned six-lane configuration may be considered in the future through a subsequent update or amendment to the University Community Plan.

It should be noted that the distributed DEIR discussed the City's adopted Multiple Species Conservation Program (MSCP) and its implementing planned preserve, the Multi-Habitat Planning Area (MHPA). Rose Canyon has been placed in the MHPA. The need for a new four-lane bridge less than three-quarters of a mile west of an existing bridge (planned to be six-lanes) when subsequently proposed and designed must consider not only its need to facilitate local traffic circulation but also its adverse effect on the wildlife resources in Rose Canyon within the regional MHPA. As a minimum, the any new or widened bridge would need to incorporate design features contained in the MSCP Subarea Plan and mitigate impacts pursuant to the Biological Guidelines. In addition, a new or widened bridge over a MHPA area would require concurrence from State Fish and Game Department and the federal Fish and Wildlife Service. Also refer to previous Staff Response Uu-2.

STAFF RESPONSE Uu-5: Comments noted. It should be noted that the commenter's suggestion that the cited proposed UTC project is a "City of Villages" project is not correct. The UTC proposal is a privately-initiated project which is being processed prior to the adoption of the proposed City of Villages strategy. The UTC project may propose to incorporate many elements which can be generally termed "Smart Growth", but it remains to be seen if this private development can incorporate transit improvements, sufficient mixed use residential component, and enhanced walkability envisioned in the proposed City of Village (COV) strategy. The commenter's suggested connection of the cited UTC project with impacts to Rose Canyon is unclear. If the commenter is implying that the UTC project would result in the widening of Genesee bridge and/or the construction of a new Regents Road bridge over Rose Canyon, this potential adverse effect on the MHPA would be addressed in a separate, specific environmental document for the UTC project. It is beyond the scope of this COV EIR and the UTC project is not covered by this document. Also refer to previous Staff Response Uu-4.

STAFF RESPONSE Uu-6: Disagree with the commenter's assertion that the EIR be changed to reflect the proposed Strategic Framework Element's stated core values regarding the natural environment and open space. The distributed DEIR, as a CEQA impact analysis document, did not focus on open space because the proposed project continues to preserve open space, and the potential villages would generally be located in existing developed areas and was determined not to directly impact open space. The DEIR focused on adverse indirect effects of the proposed strategy to guide future growth and development.

Dr. Ernie Lippe
2549 Angell Ave.
San Diego, Ca. 92122

March 22, 2002

Anne Lowry Environmental Analysis Section/Development Services Department
1222 First Avenue
Mail Station 501
San Diego, Ca. 92101

CITY OF SAN DIEGO
MAR 29 2002
PLANNING DEPARTMENT

Dear ALEAS:

Vv-1

In 1979 we purchased raw land in the Carmel Valley Area alongside the currently developing Rte. 56. This area was considered to be environmentally sensitive. The area which we had purchased was zoned for one house for every five acres because of the gnat catcher bird, purple sage, vernal pools, and for other regional critters for which there was concern. The MSCP had made a formal declaration that this area would be preserved as much as possible in its pristine condition. Any future development would be limited in scope to one house for every acre, but no more than that concentration. We sold it in 1999 for considerably less than what market price we might have been able to get had our land not been located here. The idea hindering us was to stop endangering these animals and to stop a so-called LosAngelization of San Diego County.

Now I have read Planning Commission Resolution No. 3235-PC. It is an attempt to amend the University City Community Plan and Progress Guide and General Plan, changing its intensity table for University Towne Center, allowing expansion of existing commercial use and allow multifamily residential, office, and hotel uses to be employed. The current plan does not allow these plans and for good reason.

It may be your job to be determining EIRs, but one look at our community's present traffic problems will not require a rocket scientist to conclude that our area of town is already overbuilt. Try getting off on the Rte. 805 exit going north in the morning or onto Rte. 805 going south in the evening. Are you aware of the traffic at the Rte. 5 and Rte. 805 juncture virtually every day of the week, especially on week days or when the racing season at Del Mar is active?

Vv-2

You are conducting a comprehensive traffic study to evaluate impacts of increased residential and commercial development on regional and local traffic!!! Let me tell you right now, saving you time and money. It's terrible. The fourth stop light within a quarter of a mile of three other lights is just now being constructed in front of Spreckles Elementary School.

South UC residents are arguing with one another over extending Regents Rd. over the canyon to lessen traffic now on Genesee. People west of Genesee don't want it, any more than people east of Genesee want Genesee to be widened into six lanes of traffic. That's six lanes of noise which now already exceeds noise pollution limits with only four lanes, as cars roar past University City High School. Eastern UCites think things will ease

STAFF RESPONSE Vv-1: These comments do not address the adequacy of the City of Villages (COV) EIR.

The current University Town Center plan amendment proposal is not directly related to the proposed Strategic Framework Plan and City of Villages strategy which is the subject of this EIR. Property owners have the right to request plan amendments at any time. The Planning Commission initiation of the University Town Center plan amendment proposal does not indicate support or opposition to that proposal. Traffic studies and other analysis are required to assess the merits of the proposal. If problematical traffic conditions exist in the University Community Planning area, these will be identified during the traffic analysis and environmental document for the proposed plan amendment, but these issues are beyond the scope of this COV EIR and were not covered in this document which solely addressed the proposed strategy to guide future growth and development. Also refer to previous Staff Response Uu-5.

STAFF RESPONSE Vv-2: The distributed DEIR disclosed that SANDAG's 2020 Regional Transportation Plan with its planned freeway improvements is expected to reduce freeway congestion from the current 77 miles of congestion to 29 miles in 2020. These planned improvements include High Occupancy Vehicle (HOV) facilities on I-5; however freeway congestion would continue occur on I-5 as it merges with I-805.

Refer to previous Staff Response Uu-4 and Uu-5 for discussion of Genesee Avenue and Regents Road.

The commenter's perception that University City is "already the most densely area in town with the exception of downtown" is wrong in terms of residential densities; there are eleven communities within the City of San Diego with significantly higher residential density than University City.

if Regents Rd. is extended. Let me tell you that it's a bad situation right now. The common foe for all of us in UC, whether it be east or west of Genesee, is the planned development as well as the existing development in North UC. That's our common foe. I am not one who stands in the way of progress, but UC is already the most densely developed area in town with the exception of downtown. If Genesee is widened and if the extension of Regents Rd is implemented, then developers for North UC will rationalize that two new arteries for traffic will mitigate the problem, so let development occur. This won't happen, since any development will outstrip the city's ability to solve the problem.

Vv-3 You are considering transit-oriented development into the area. You are twenty years too late on this one. That should have preceded the development that now exists. Any such transit connection built will only further impact an already too crowded situation, since such transit will not be carrying UC residents. These passengers will be from other areas bussed into our community. Take a look at the occupancy of the rail transit which goes by Qualcomm Stadium for Padre or Charger games. The cars aren't filled then, nor any other times when there are no games. People still drive into Mission Valley and Fashion Valley for shopping. The Californians' love affair with their cars is not going to go away.

Vv-4 Appropriate mix of residential, office, and hotel and retail uses is in your plan. We are overbuilt now, so any additions will not be appropriate. Have you personally tested the impacted traffic jams in our fair community? Many of us right now work and live in this community. Building more places for people to work and to live closeby will not make things better, even if they can walk to work. It simply means that there are more people per square footage than there were previously. It should not take a graduate degree to realize this fact.

Vv-5 You mentioned an affordable housing component. Not on your life. I bought our home thirty years ago and it has appreciated. Placement of low-cost housing is not going to help my property values. My wife and I worked for what we got. No government program diminished someone else's property to give us ours. Why not put low-income housing in La Jolla or Rancho Santa Fe? They would not stand for it. While I urge people to go to school, work hard, and invest in a house of their own, I know it's not fair for them to be able to do it at my expense through government subsidy or some such liberal program. Go somewhere else, please, for them to get a "piece of the rock."

Vv-6 Vehicular, pedestrian, and bicycle access??? This was promised to us over eighteen years ago at public meetings held at Standley Jr. High School, long before many of the existing buildings on La Jolla Village Drive were even built!! The area around UTC is one of the most pedestrian/driver/bicyclist unfriendly areas in town. Don't think that additional building incorporating a few trails or allowing building to be developed right down to the sidewalks will improve a thing.

Please do not redefine us as some "urban node." WE ARE GRIDLOCKED!"

STAFF RESPONSE Vv-3: Transit improvements that can significantly impact a community may take place before or after initial development of a community although major transit infrastructure typically go to already developed areas. Addition of major transit infrastructure, such as light rail, may allow additional development or redevelopment to occur in some areas. Vastly improved transit may be the only viable solution to many parts of the City where traffic congestion exists; whether or not transit improvements would be a solution, it can clearly be said that improved transit would present a viable option to people who either choose to avoid congestion or wish not to contribute to it. Locally, whether transit improvements would make more development feasible in the University Town Center area will be appropriately analyzed in the separate, specific environmental document for the proposed private-initiated, plan amendment but was not covered by this programmatic EIR.

STAFF RESPONSE Vv-4: The proposed Strategic Framework Plan and City of Villages strategy call for pedestrian orientation, mix of uses and mix of housing types including housing affordable to moderate and middle income workers. However, determinations regarding specifically where such uses should be located and where infrastructure is adequate to support them will be made during the subsequent process of amending or updating individual community plans. As noted, in the case of the University Town Center (UTC) area, a privately-initiated plan amendment has been proposed and is being reviewed separately. This separate UTC proposal is beyond the scope of this COV EIR and was not covered in this document which solely addressed the proposed strategy to guide future growth and development.

STAFF RESPONSE Vv-5: The commenter is incorrect in asserting that the proposed City of Villages strategy to guide future growth and development is in anyway a City proposal for low-cost housing or in implying that affordable housing somehow equates to low-cost housing. Affordable housing is moot point in a region where the median price of a detached home has risen above \$300,000. The project would result in attached housing units at market costs or rents. It is the vision of this strategy that attached units would facilitate not only renters but first-time home owners who may need to enter the housing market at a more affordable level; in addition, attached units may be a more logical option to people who no longer need or want their larger, detached homes but who may want to remain in the same community.

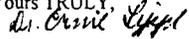
STAFF RESPONSE Vv-6: Comments noted. The proposed Strategic Framework Plan and City of Villages strategy that are the subject of this EIR do not make specific recommendations regarding the appropriate level of development in University City. Two potential village centers were included in the citywide environmental analysis. However, a determination regarding whether either of these potential villages could accommodate additional development intensity could be determined only through the subsequent plan update or plan amendment process.

It should be noted that the University City area is already a part of an "urban node" in the northwestern area of the City. This expanded urban node includes the UTC area with its regional shopping and offices, the UCSD campus, the medical research in the Torrey Science park, the research and development in Sorrento Valley, and the business offices in western Mira Mesa.

Vv-7 Incorporation of urban open space is mentioned. I heard Abbe Wolfsheimer state that the city would "create acres of open space," namely, the area between the high rises through which you could see the sky. You have to be kidding!!!

Vv-8 In conclusion, my first paragraph in this letter was directed at you to remind you of the concern we should have for our environment. I fail to see any concern for Homo Sapiens, that's us, when I listen to plans for development by planners who certainly must have some form of blindness to the reality of a situation. University City is a great place to live, but it isn't as great as it used to be. Why? It's the traffic. More people and more development will not improve matters. Nonetheless, we have a wonderful location, close to the ocean, shopping, schools, recreation. However, every actualized proposal diminishes our quality of life. Your total plan if implemented will affect clean air standards, safety, property values. Other than greatly expanding the tax base, something which all politicians salivate over, it will not benefit UC residents as a group.

Vv-9 I urge Cecilia Williams, Linda Lugano, and anyone else involved in this project to make a recommendation to the city to move on to other greener pastures. Just as we were told that we could not build on our land in Carmel Valley, you should tell the City Honchos to withhold permits for future development of North UC and especially for UTC. DO NOT AMEND THE UNIVERSITY CITY PLAN!!! Please!

Yours TRULY,

Dr. Ernie Lippe (858) 453-2387

STAFF RESPONSE Vv-7: Comment noted. The City has created "acres of open space". The distributed DEIR disclosed the implementing efforts to assemble the Multi-Habitat Planning Area, the City's planned habitat preserve. The DEIR disclosed that 29,703 acres of the planned 52,012-acre goal of the MHPA has been attained; this includes the 1,800 acres in the University City Community Planning Area which have been placed in the MHPA.

STAFF RESPONSE Vv-8: The proposed City of Villages strategy is a plan for "*homo sapiens*"; it is a strategy to guide future growth and development through redevelopment and infill to provide compact, mixed use development with walkability, improved transit service and accessibility, public space, sense of community, and enhanced urban form. This strategy proposes to meet the future housing needs and provide community amenities with no adverse effects to existing single family neighborhoods or open space areas.

STAFF RESPONSE Vv-9: Comments noted. It should be noted that the approval of this proposed City of Villages strategy would not amend the existing University City Community Plan; this strategy proposes no land use changes.

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

03/25/2002

CITY OF SAN DIEGO

MAR 28 2002

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

Ww-1

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. There is also a senior citizens condominium complex and other condominiums plus apartments for a total of more than 600 units less than one mile from the Governor/Genesee intersection.

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

Ww-2

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.

Ww-3

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.

Ww-4

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

Ww-5

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

STAFF RESPONSE Ww-1: Neither the proposed Strategic Framework Element nor the revised draft City of Villages map, which are analyzed in the distributed EIR, suggest development of a village center or increased density for property in the vicinity of Genesee Avenue and Governor Drive. The revised 4th draft City of Villages map (included in the distributed DEIR) identified this existing shopping center (University Square) as a potential future village center.

It should be noted that for most existing shopping centers, the large open parking lots could be redeveloped with attached residential units and parking structure; it type of infill would be consistent with the proposed strategy.

STAFF RESPONSE Ww-2: Detailed design standards for infill projects in University City are beyond the scope of the proposed Strategic Framework Element which is analyzed in this EIR. The distributed DEIR focuses its analysis on the proposed strategy to guide future growth and development; details or specificity in the DEIR is limited by the subject proposal which would not result in any land use change or any specific village location until community plans are amended or updated. City urban design standards for the proposed villages would be included in the subsequent Urban Design Element.

STAFF RESPONSE Ww-3: The distributed DEIR analyzed the regional traffic impacts on the freeway system. It does not analyze or address specific circulation system modifications such as local street widenings or bridge crossings; no change to the existing, adopted circulation system is proposed with the proposed strategy. Also refer to previous Staff Responses Uu-4 and Uu-5.

STAFF RESPONSE Ww-4: Comments regarding facilities in South University City are noted; these comments do not address the adequacy of the distributed DEIR. It should be noted that neither the proposed Strategic Framework Element nor the revised draft City of Village strategy or map which are analyzed in this EIR, recommend land use changes anywhere in the City including South University City.

STAFF RESPONSE Ww-5: Comments regarding facilities in South University City are noted; these comments do not address the adequacy of the distributed DEIR. The adoption of the proposed strategy would not directly result in any "higher density housing"; any implementing land use changes would be considered with the subsequent community plan amendment or update. The required subsequent community-level, environmental review will consider specific municipal services needs.

RESPONSE TO THE DRAFT EIR FOR THE CITY OF VILLAGES

obvious that Regents Road needs to provide North/South traffic access through South UC as well as that presently provided by Genesee.

4.0 Schools

Ww-6

UC High, Standley Middle School, and Curie Elementary School are located near the Governor Drive/Genesee Ave. intersection. When schools are in session a significant increase in traffic is noted. Also a large contribution to the traffic on Genesee is made by UCSD. Existing traffic plus the addition of school traffic creates gridlock at the intersection for approximately four hours per day during the week. This problem needs relief that may be provided by constructing the Regents Road Bridge. Before additional high-density housing is constructed the problems of traffic and transportation from the village must be addressed. Also the village must be pedestrian and bicycle friendly.

5.0 Water and sewage

Ww-7

In regard to increased water usage and sewer capacity: Of course any infill development will further burden the water and sewer system. Sufficient infrastructure must be provided to accommodate the increased population density.

6.0 Cumulative impact

Ww-8

Like all past community plans if the village concept becomes a project that provides a suitable quality of life for the occupants and its neighbors, it will receive the support of the community. If the project is turned over to a developer who is strictly profit minded we could end up with a big waste of money and a horror story. We call to your attention the big "affordable" housing projects in Chicago that are now being torn down. The developers became wealthy at taxpayer expense but the low-income residents were not provided with decent safe housing.

7.0 Alternatives

Ww-9

There are other areas, which would be more suitable than placing high density housing near a congested intersection. In particular, in South UC, the area near the Catholic Church along the southern section of Regents Road between Governor Drive and SR-52 on the west side of Regents would provide a more suitable site.

W-10

According to the Census Bureau by the year 2010 one in every five Americans will be over the age of 65. The residents of South UC typically are in or closely approaching the senior category. A moderately sized multiunit residential complex providing for low-income elderly would probably be welcomed by the community. Perhaps a Silvercrest home, which would be built, managed and maintained by the Salvation Army, in cooperation with HUD would prove to be a success.

STAFF RESPONSE Ww-6: Refer to previous Staff Responses Ww-3, Ww-4, and Ww-5. It should be noted that walkability and bicycling are major features of the proposed City of Villages strategy.

STAFF RESPONSE Ww-7: The distributed DEIR addressed the regional water and subregional wastewater impacts of expected growth and the potential additional attached units which could result from the ultimate implementation of the proposed City of Villages strategy; it was determined that there would be sufficient water supply and wastewater treatment capacity.

STAFF RESPONSE Ww-8: Comments are noted; these comments do not address the adequacy of the distributed DEIR. It should be noted that the commenter's cited "affordable" housing projects in Chicago appear to reference assisted public housing; the proposed City of Villages strategy in no way proposes public assistance housing; the resultant attached units are all rented or sold at market rates. The proposal envisions that the attached units would be more affordable.

STAFF RESPONSE Ww-9: Comments regarding other potential village sites University City are noted; these comments do not address the adequacy of the distributed DEIR. It should be noted that other village sites could be considered in a subsequent community plan update.

STAFF RESPONSE Ww-10: Comments are noted; these comments do not address the adequacy of the distributed DEIR. It should be noted that the density assumptions of neighborhood village center on the 4th draft City of Villages map (included in the distributed DEIR) have been reduced to a moderate density range (30 to 45 du/acre); this somewhat matches the commenter's suggestion of a "moderately-sized multiunit residential complex". Also refer to previous Staff Response C-4.



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1362-B W. San Ysidro Blvd.
San Ysidro, CA 92173
March 20, 2002

CITY OF SAN DIEGO
MAR 25 2002
PLANNING DEPARTMENT

Ms. Anne Lowry, Senior Planner
Environmental Analysis Section/City Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Dear Ms. Lowry:

Re: Comments- COV/Strategic Framework Element/DEIR

I want to follow up on my verbal remarks on the document, which I presented during the City of Villages Community Workshop held March 7th in San Ysidro.

Xx-1

If, at its most fundamental core, the Strategic Framework envisions increased housing density, most specifically through means of "mixed use" commercial/housing to be built over existing, typical single story commercial within San Diego's older neighborhoods in general and along commercial business corridors in particular; *then*, an extraordinary high degree public *and* private partnership/collaboration is a precondition for success. Here I assume a finite availability of public dollars for the literally millions (if not *billions*) of dollars required for ancillary public infrastructure improvements.

This means engagement, from the get-go, of owners of commercial properties in the "older" commercial neighborhoods, which, in my experience in San Ysidro and on El Cajon Blvd., most typically is characterized by very *small* property holders (*not* typically Corporate America).

Xx-2

Accordingly, I feel that a *different* approach, to be successful, is called for: to reach out to this very distinct segment of our total community; specifically with:
** practical (financial) incentives in place, causing the small holder to "risk" mixed-use projects on their property, *and*
** regulatory relief, *more* regulatory "incentives," to include an attitudinal change on the part of Development Services staff as to who is the *customer*.

Xx-3

In the case of San Ysidro, where geographical limitations form perhaps the *greatest* challenge to mixed-use confronted in the entire City (given extremely confined, congested business corridors grossly deficient in public infrastructure--streets, sidewalks, street lights, etc.), special measures are called for if the City of Villages is to work! For example, a vastly reduced parking requirement should be in place re the additional housing so constructed, and/or coupled with some creative public parking solutions, such as an area/group/zonal parking garage approach.

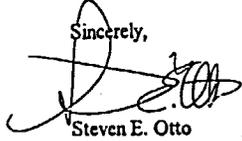
STAFF RESPONSE Xx-1: Please refer to staff responses B-52 and B-89.

STAFF RESPONSE Xx-2: Although the concern you have raised is not related to CEQA, it is agreed that an efficient process for new development is needed for successful implementation of the City of Villages. Section 9.1 of the Action Plan states "Identify and address City structure and organizational issues that may slow down permit processing." City staff has been meeting with the development community on an ongoing basis to identify areas in the entitlement process that could be improved immediately to encourage more infill housing to be built. Knowing that construction defect litigation is a statewide issue, city staff has been working to support efforts initiated by the Regional Chamber of Commerce and others that would address this issue at the state level.

STAFF RESPONSE Xx-3: Please refer to staff response B-43

Xx-4 Finally, in this vein, I am aware of one small commercial/industrial property owner, Marvin Carpenter, who has been trying to re-develop his property for the last nine years, but, has been stymied at every turn in his contacts with Development Services. How many (property) tax dollars have been lost to the City as a result?! Mr. Carpenter's experience sends the wrong message, and does not portend well in *implementing* the City of Villages.

Sincerely,



Steven E. Otto

STAFF RESPONSE Xx-4: This comment does not address the adequacy of the EIR.

R. Jarvis Ross
4352 Loma Riviera Court
San Diego, CA. 92110

March 12, 2002

City of San Diego
Planning Department
San Diego, CA 92101

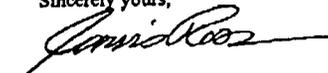
RE: DEIR #4040-1027

Attn: Ms. Colleen Clementson

Please be advised that considering the overall concept and subject documents pertaining to, "The City of Villages" and it's impacts on the existing urban areas of the city of San Diego I find the concept fatally flawed in numerous areas.

- Yy-1 (1) The city persists in ignoring the existing "D" and "F" rating of most of the major arterials serving motorized vehicles. It consistently adds additional housing impacts and mitigates the traffic through unfunded and potentially unrealized solutions.
- Yy-2 (2) It disregards the compounded effects of additional vehicular internal combustion engine exhaust upon air quality in proposed densified areas in the absence of pre-existing alternate means of transportation.
- Yy-3 (3) It continues to propose 1950's solutions to most 2002 transportation problems.
- Yy-4 (4) It disregards the limited supplies of potable (drinkable) water available to Southern California and the increasing demands upon those supplies closer to their sources than the City of San Diego.
- Yy-5 (5) The cyclical continental droughts that are projected by scientists will be devastating to the existing population let alone increased density.
- Yy-6 (6) Increased density will also result in increased demands upon energy which is already in a critical state not only in terms of cost but also it's large dependence on air polluting fossil fuels.
- Yy-7 Some of these issues may be solved if we address them now. However, that must be done beforehand not postponed with dreamworld mitigation. For the present the City of Villages must be tabled otherwise we will be constructing a city worthy of no one's affection.

Sincerely yours,


Jarvis Ross

STAFF RESPONSE Yy-1: Comments noted. It should be noted that LOS D is considered acceptable by the City. The solution of widening congested major arterials may be effective in traffic circulation, but it would probably be highly disruptive to the community. The proposed City of Villages strategy to guide future growth and development would allow an alternative transportation modal choice to those who wish to avoid (or not contribute) to the traffic congestion. Also refer to previous Staff Responses B-33 and B-34.

STAFF RESPONSE Yy-2: The distributed DEIR determined that traffic and associated air quality impacts are partially reduced and, therefore, significant and unmitigated. The City's City of Villages strategy is being proposed concurrently with MTDB's Transit First plan for improved and expanded public transit network. Also refer to previous Staff Responses B-44 and B-45.

STAFF RESPONSE Yy-3: The distributed EIR stated that the proposed City of Villages encourages the use of a vastly improved and expanded transit system by concentrating and directing the growth to urbanized core including such as areas Mission Valley and Downtown. The proposed project combined with regional efforts by SANDAG and MTDB's Transit First program could encourage the additional residents engendered by this proposal, to choose alternative, less impactive, transportation modes. This is unlike planning solutions that took place during the 1950's, which were characterized by the development and expansion of freeways and major arterials as a means of addressing transportation demand issues for new suburban developments. Also refer to previous Staff Responses B-6 and B-7.

STAFF RESPONSE Yy-4: Water resources were analyzed, and this included the potential physical impact posed by the need for another aqueduct (large underground water pipeline) to deliver imported water to the San Diego region and the potential significant impact on water resources within the City. The County Water Authority (CWA) has indicated that another aqueduct is not needed to supply future water demand and that the water demand in year 2020 (based on the SANDAG's 2020 forecast) can be met with available and planned supplies. (See attached CWA report.) Due to these findings, the distributed DEIR stated that there were no significant impacts on water resources within the City.

STAFF RESPONSE Yy-5: Comments noted. It should be noted that large water storage plans throughout Southern California has been planned to even out the cyclical natural water supply.

STAFF RESPONSE Yy-6: The distributed DEIR determined with the assistance from the San Diego Regional Energy Office (p. IV-86) that there appears to be adequate existing and permitted sources of regional energy to meet future demands. Higher energy costs may encourage continued conservation and stretch energy resources. The proposed City of Villages strategy with its urban design features would not result in the use of excessive amounts of energy and would not pose a significant effect on future energy resources.

STAFF RESPONSE Yy-7: Comments noted. The commenter's suggestion to do nothing until solutions are known is another alternative; however, this approach continues the existing trend of development (the no project alternative). Without the strategic planning of additional future growth and redevelopment in locations which would maximize the development of a world class transit system, the current need for affordable housing would be met in less inopportune areas. With further delay to plan for future growth, the opportunity for an enhanced urban form with compact, mixed use infill/redevelopment featuring walkability, public space, and sense of community, would be lost for another 20-30 years

8383 Center Drive, Suite J, La Mesa, CA 91942
Office Phone • (619) 469-4641
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March 22, 2002

Draft Environmental Impact Report, City of Villages Growth Strategy/Strategic Framework
Element – Comments by Jim Schmidt (address & phone # above)
Attention: Anne Lowry, Senior Planner

CITY OF SAN DIEGO
MAR 26 2002
PLANNING DEPARTMENT

Zz-1

The City of Villages Plan is a very impressive Plan and the DEIR is very well done. Those City employees who helped produce the Plan should be congratulated for their dedication and hard work in producing the Plan. City staff made some very logical and well thought out findings in the DEIR. A key one is that the Plan will have no direct or indirect impacts upon the Multiple Species Conservation Program (MSCP). Also the proposed plan will not pose a significant land use impact even though the Plan provides up to an additional 37,000 attached homes in the City of San Diego. "Additional" is a key word since San Diego as you know has a severe housing shortage/crisis, which is a primary reason for the affordable housing problem. "Attached" is also a key word because it results in more density with more units per acre as well as more open space and a reduction in sprawl. The additional homes added under the Plan will be of great benefit to the San Diego region. Success of the Plan will encourage more use of transit and more walking and biking with the benefits of helping relieve traffic congestion. The DEIR also contains very detailed and logical mitigation measures.

Zz-2

In reviewing this letter, written in response to the Plan and the DEIR, I sincerely hope that City staff will read this letter from a positive standpoint. The writer views himself as a positive and solution oriented person who believes that it is not only important but crucial to successfully implement well thought out plans and the City of Villages Plan is certainly in that category. Therefore the major issue remaining after adoption of the Plan, is to make certain that the Plan is successfully implemented. I regret to say, but it is my opinion, that the Plan will not be successful unless the almost certain impediments to the Plan are either eliminated or greatly reduced in importance. Without removal of the impediments the Plan could eventually be put on the shelf like many other reports. Then the efforts, hard work and time of the Plan's preparers will be wasted and the Plan's key and very important goals of more density, less sprawl and more use of transit, unfortunately, will not be attained. This letter therefore concentrates upon on the importance of removing the impediments to a very fine Plan.

Zz-3

Readers should be fully aware that the writer of this letter sincerely believes that those who produced the Plan did outstanding work and that they should be able to see good results put in place and happen in the public interest. The suggestions of making significant improvements in the providing of service in the approval process for all new development and re-development is very, very important. Along with the elimination of the construction defect impediment, it will mean that the producers of the City of Villages Plan will see their good work result in the achievement of the goals of the Plan. For people involved in customer service in either the public or private sectors, it is a good feeling and it is very enjoyable to provide good service. I am confident that the importance of the Plan being successful will stimulate the City and its staff to be positive and solution oriented with the key goal of removing impediments to make the Plan happen.

STAFF RESPONSE Zz-1: Although the issues you have raised do not address the adequacy of the EIR, they are the critical issues that were used as a basis for preparing the Strategic Framework Element and City of Villages strategy. Your understanding of the City of Villages strategy and its benefits for San Diego are appreciated.

STAFF RESPONSE Zz-2: Although the issues you have raised do not address the adequacy of the EIR, you have identified an important component of the overall Strategic Framework Element: implementation. From the beginning of this planning effort, the City of San Diego identified implementation as the key to a successful plan. For that reason, the proposed Strategic Framework Element is accompanied by a 5-Year Action Plan which identifies specific implementation measures necessary to realize the Strategic Framework vision. Each of the implementation measures are linked to the policy recommendations included in the Strategic Framework Element. Actions range from measures needed to align other city policies and regulations, to improving the permit process, and building new partnerships with the private sector.

STAFF RESPONSE Zz-3: Although the issues you have raised do not address the adequacy of the EIR, it is agreed that an efficient process for new development is needed for successful implementation of the City of Villages. In fact, Section 9.1 of the Action Plan states "Identify and address City structure and organizational issues that may slow down permit processing." Additionally, City staff has been meeting with the development community on an ongoing basis to identify areas in the entitlement process that could be improved immediately to encourage more infill housing to be built. Knowing that construction defect litigation is a statewide issue, city staff has been working to support efforts initiated by the Regional Chamber of Commerce and others that would address this issue at the state level.

Zz-4 **Attached** and also incorporated by reference to this letter is my article on the City of Villages that was published in the Daily Transcript on March 7. The article refers to SANDAG's excellent report, "Solving the San Diego Region's Housing Crisis". I also urge everyone involved at the City to read and digest the excellent 7 page February 2002 report on the housing shortage and crisis that was recently completed by the San Diego Regional Chamber of Commerce (this report should be required reading by everyone in the Planning and Development Services Departments and the SANDAG report should also be a must reading).

A recent real shocker was the article in the March 14 Union Tribune disclosing that the median price of existing homes in the County is now about \$300,000, up from \$200,000 four years ago. Slow processing of applications makes inflation worse and for builders who are paying interest on a loan, it is more costly and for some they cannot afford it. The additional interest costs due to delay are passed on the home buyers in higher home costs. Subsidies for buyers and rents are not helping as much as home prices and rents keep escalating with the negative result of fewer people receiving benefits as the funding dollars must be higher now for each recipient. The push for inclusionary housing, where buyers of the same homes pay different prices, is a suggested solution that is controversial. Inclusionary housing has both sincere advocates who strongly support the idea as well as opponents. More affordable housing through the market place is a solution that will reduce the need to consider solutions that many view as negatives.

Zz-5 The solution to the construction defect problem, which has taken most of the previous condo builders out of the market because of the litigation and un-availability of construction defect insurance, has virtually eliminated new condos except for luxury units. The problem will be eliminated by the passage of AB 600 in Sacramento. This bill will protect home buyers with good protection through 10 year new home warranties to ensure a good product for the buyers. The legislative solution will encourage and stimulate the building of more condos (with the benefits of more density with more open space, less sprawl and more use of transit) to help make the City of Villages Plan a success. Since it is clear that the trial lawyers do not want a solution that doesn't allow immediate litigation, it is of critical importance that local governments, labor, business and all civic organizations join together to help the builders get this vital legislation passed (see page 4 of the Chamber report for more details). Passage of AB 600 as proposed will then get the builders back into the condo market.

Zz-6 The bottom line is that not enough new housing of all types is being built in the County. The new condos are primarily in the higher price range like in the downtown re-development areas with subsidies necessary to allow housing for some moderate income residents. It should be noted that the building of new housing anywhere helps at least 3 families to move up. In recent years not enough housing has been built to accommodate our growth, which is mainly internal, with the result that home sellers and apartment landlords are in charge. The result is a housing vacancy factor of less than 2% in the County and home buyers and renters are suffering with higher prices and rents. I recall when the County vacancy factor was at the other extreme at over 11% in the 1960s. The San Diego area at that time was in a depression (not a recession) and people were unable to sell their homes without drastic reductions in prices. There were many foreclosures after the region was hit with the loss of 40,000 aerospace jobs in the early 1960s.

Zz-7 The information on the Temecula/Murrieta/Rancho California area in my attached article is startling with the current situation of 37% of new home buyers there commuting to jobs in San

STAFF RESPONSE Zz-4: The issue you have raised does not address the adequacy of the EIR. Thank you for providing the articles. We have added them to our collection of articles that deal with future growth and development.

STAFF RESPONSE Zz-5: Although the issues you have raised do not address the adequacy of the EIR, the lack of construction defect insurance, like construction defect litigation, is an issue City staff is aware of and is continuing to work with others groups to address at a state level.

STAFF RESPONSE Zz-6: Although the issue you have raised do not address the adequacy of the EIR, the need for housing to support our current and projected population is at the root of the proposed Strategic Framework Element. As outlined in the Strategic Framework Element, the City of Villages strategy is intended to increase the housing supply while also increasing the variety in types of housing that are produced, particularly attached housing.

STAFF RESPONSE Zz-7: Although the issues you have raised do not address the adequacy of the EIR, it is agreed that the demand for affordable housing has lead many San Diegans to purchase homes in Riverside County which increases traffic congestion in the 1-15 corridor. The City of Villages strategy, by creating more opportunities for housing within the City that are linked to jobs through walking a transit, can begin to address this issue.

Zz-8 Diego County. In the Home Section of last Sunday's Union-Tribune, the map and list of new home sub-divisions in Riverside County advertised in our local paper to get San Diegans to buy homes there, was 13 (on other occasions the advertising number has been 18 or 19 new sub-divisions). The issue is the availability of affordable housing since new home prices in Temecula/Murrieta/Rancho California are \$100,000 to \$150,000 below our San Diego new home prices. Buyers there drive an extra 60 to 100 miles from Riverside County to their San Diego County jobs week-days which is a real negative that increases I-15 traffic congestion.

STAFF RESPONSE Zz-8: Refer to previous Staff Response Zz- 7.

Zz-9 What can the City do about improving housing affordability and to make certain that the City of Villages Plan is successful? The Development Services and Planning Departments can quickly develop ways and procedures to improve and speed up their services to the public and they can do it. Regulations and procedures need to be changed to improve services. Simple things that can be proposed are like explaining the importance of having all staff answer their own phones, return phone calls promptly and being service oriented with the key bottom line of stimulating City staff to have the desire to provide good service to the public. I always answered my own phone as House Legal Counsel of one financial institution and as President of another and also while serving in State Government. It works and callers not only get better service but they know that you really care about providing good service. It is a good feeling to provide good service whether in government or business and customers really appreciate it.

STAFF RESPONSE Zz-9: Refer to previous Staff Response Zz-2.

STAFF RESPONSE Zz-10: Although the concern you have raised is not related to CEQA, your suggestions are noted and can be included in the discussion as the entitlement process through the Action Plan.

Zz-10 It is very obvious that Community Planning Groups have way too much power. Time limits for their review of applications in process and automatic approval ideas should be looked at. There can be strict deadlines set up for Planning Groups and opponents to respond and comment. Deadlines can be set up for completing process completion of applications and paper work for permits and sub-division maps. Good quality of work on processing of applications and prompt service can go hand in hand. Slow service is a bad thing in either business and government. People who provide good service are heroes. Give awards for the staff who give the best service. Once the City staff involved sees how much their hard work is appreciated, they will really become enthusiastic and also creative in coming up with ways to continually upgrade service. Keep in mind that good service and quality work can go hand in hand.

STAFF RESPONSE Zz-11: Refer to previous Staff Response Zz-10

STAFF RESPONSE Zz-12: Comments noted. The environmental process, environmental watchdog groups, and the community planning groups, all three may add time and money to the development permit process. The environmental process is solely a City controlled, state required procedure, and the City can guide/facilitate development proposal review by the community planning groups. As part of the incentives packet for subsequent village development, the City will shorten permit processing and could aid in cutting the time for CEQA document preparation. Active partnership with the planning group, the community, City and developer may also make the processing more efficient.

Zz-11 The issue of high fees for new projects should be carefully reviewed and the views of experts, who can provide good input on that issue, should be listened to and carefully considered. It doesn't seem fair or make sense to have high processing fees to pay for slow service.

STAFF RESPONSE Zz-13: Comment noted.

Zz-12 The environmental overkill people have too much power and they are real contributors to our high housing prices. They do not seem to care about the 75% of our families who cannot afford to buy a median priced home. These continual opponents should not be able to use the law of delay, which is delay, delay and delay, and results in higher and higher home prices and rents. Since these opponents oppose sprawl and continually raise sprawl as an issue, they should strongly support a permanent solution to the construction defect problem that will encourage builders to return to the condo market as more condos means less sprawl because of increased density to handle the region's growth.

Zz-13 The key point is that delay in processing of building permits and maps is an impediment that can be overcome by "caring" and making things happen. Good fast service by City Departments, coupled with a Sacramento legislative solution to the construction defect problem, can and will make the City of Villages Plan a real success for America's Finest City. Why not make it

happen? Don't have a very well prepared Plan put on the shelf because of impediments that can and must be overcome. To repeat, please consider my suggestions as positive ones as I sincerely believe that they are very much in the public interest. Making the City of Villages Plan the huge success everyone wants it to be, is an attainable result if the impediments are removed. It would be a sad day if such a fine and well thought out Plan is not successfully implemented and winds up being just another plan that is put on the shelf. The impediments can be removed and must be removed in order to make certain that the excellent City of Villages Plan is fully implemented.

Sincerely, and with congratulations again on a very well done Plan and an excellent DEIR. The City of Villages Plan is a very impressive Plan.



James C. Schmidt,

Retired banker and attorney. Public member of the City-County Re-Investment Task Force which enforces the Community Re-Investment Act of 1977 (CRA) since 1991 as the appointee of George Stevens and Leon Williams/Ron Roberts. The Task force leads the way in advocating and monitoring the financing of affordable housing for all areas of the County.

CC: Gail Goldberg, Planning Director
Coleen Clementson, Gen'l Plan Program Manager
Stephen Haase, Development Services Manager

ATTACHMENT TO COMMENT LETTER ZZ

THURSDAY, MARCH 7, 2002 • SAN DIEGO DAILY TRANSCRIPT 9A

San Diego Daily Transcript

OPINION & COMMENT

First Amendment Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.

Say 'yes' to the City of Villages

San Diegans continue to face a terrible affordable housing situation with a residential vacancy factor in the 1-percent to 2-percent range, resulting in severe financial consequences for home buyers and renters.

The situation escalated in 2000 when the county added 40,000 jobs and only 13,000 housing units. The National Association of Realtors just rated San Diego No. 5 nationally in median priced homes of \$298,600. A family can typically afford to purchase a home with a value of around 2 1/2 times the gross family income (San Diego is in the \$50,000 median range). Less than 25 percent of San Diego families can now afford to buy a median-priced home with a declining percentage. Doubling and tripling of families in one unit is the only solution for many.

The City of Villages plan for San Diego is now on the table. It is an excellent plan with more density (a must) — which means more affordable homes, less sprawl and more open space with more walking and use of transit. It will also help in retaining the important goal of people living close to their jobs to help relieve traffic congestion. It would be a shame if the City of Villages in America's finest city, "was not successful because of the affordable housing situation and impediments to development that can be removed.

The Temecula/Murrieta/Rancho California area has a continuing population explosion with its affordable housing. The city of Temecula's population has increased by 129 percent in the past 10 years to 62,000. Now 37 percent of new home buyers there commute to jobs in San Diego. They buy there not because they love to drive an extra 60 to 100 miles to their jobs; median new home prices there are at least \$100,000 to \$150,000 less than in San Diego.

For the past 12 years I have served as a public member of the City-County Re-Investment Task Force which helps enforce the Community Re-Investment Act of 1977 (CRA). The banking institutions our Task Force monitors are ready, willing and able to help finance solutions to our crisis. One of the sad situations is that subsidies to help with rents and down payments for low and moderate-income residents, do not go as far now and serve fewer and fewer people as housing prices and rents continue to escalate.

An important point is that the development of new housing is not the cause, but rather the result of growth. Do we want to continue to have a strong economy with job opportunities so our children can get jobs and stay here? If the answer is "yes," then we must have more housing. Any new housing built in the county results in the movement of an average of three families. New homes anywhere opens up more housing for other San Diego County residents, relieves shortages and helps to keep the vacancy factor from hurting housing affordability.

In 2000 Sandag set in place a committee of the public to discuss housing. Last year Sandag

produced an excellent report entitled "Solving the San Diego Region's Housing Crisis." The Sandag Board has made housing affordability, smart growth, etc. major issues at recent policy meetings. Sandag has a major half-day summit meeting on March 8 on smart growth and regional solutions and to then implement them. The report highlights five key reasons for the crisis:

1. Fiscal inequities with local government receiving minimal shares of property taxes except in re-development areas.

Local government needs to get a fairer share of property taxes from the state. A higher share of local property taxes could help reduce fees paid by new housing development that is passed on to buyers and renters. It will help local government to not rely as much upon sales tax revenues for the budget, infrastructure and other needs. The city of San Diego has effectively used the additional/higher percentage of property tax revenues allowed. In re-development (tax increment), extra tax services have been used by the CDCDC to redevelop downtown with Horton Plaza, Gaslamp and other areas.

2. Availability of capital.
3. Government regulations (this means slow service) and development fees.
4. NIMBYs (Not In My Back Yard).
5. Construction defect litigation.

Two main problems that are solvable and crucial to help make the City of Villages concept work are numbers 3 and 5.

Slow service seems to be a way of life. If you ask a builder how long it takes to process a subdivision map in the city of San Diego, the immediate response is "three to four years." The city manager is in charge, so why not ask (request) him to set automatic deadlines after completed papers are filed? Why not have the building permit/subdivision map automatically approved in 30 days if the papers for the item, with staff recommendations, are not put on the next month's agenda for the Planning Commission? Why not add a second Planning Commission to provide the commissioners more and earlier meeting times to make final and quicker decisions?

Faster service will also help with the NIMBY problem, as NIMBYs and the regular overkill opponents will not be able to use "Parkinson's Law of Delay." The key point is that there must be a "dentist" in government to provide good service. Chula Vista is doing it and their new housing is much more affordable than in most other county areas.

Construction defect litigation needs an immediate legislative solution, with builders required to provide a good product with warranties, mediation and arbitration to protect new home buyers (and successors) for 10 years. A solution that requires litigation to be the last resort will get more builders to return to the condominium market with the positive benefits of more density, less sprawl and more open space. Now about 60 percent of former condo builders refuse to build condos either because they can't get condo insurance or can't afford it. Local government is now getting involved and Sandag has made solving construction defect litigation problems as one of its seven legislative priorities in Sacramento for 2002.

In summary, lets do something both locally and in Sacramento. Builders, local government and civic organizations — including environmentalists — need to team up on a construction defect solution. It is crucial to ending the housing affordability crisis. More affordable housing will help our citizens avoid Temecula and coupled with fast service, will also ensure that the City of Villages study/plan doesn't have impediments to interfere with its planned success. Let's not have a well-done study put on the shelf. Impediments to solving our affordable housing crisis can be removed. Say "no" to Temecula and "yes" to the City of Villages.

Schmidt is a retired banker and attorney. He has been active in housing and transportation matters on both a state and local level for more than 30 years and served in 3 positions in California state government.
Source Code: 30020306bcb

To: Lawrence C. Monserrate
Assistant Deputy Director
Land Development Review Division
Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101

MAR 26 2002

From: T.C. Schmidt
5953 Castleton Drive
San Diego, CA 92117

Subj: The City of Villages Growth Strategy - Strategic Framework Element
Draft EIR (LDR No. 40-1027/SCH No. 2001061069)

Date: 23 March 2002

cc (e-mail): Hon. Dick Murphy (Mayor, City of San Diego)
Donna Frye (Council Member - Sixth District)
Byron Wear (Chair -- Land Use and Housing)
C. Cruz Gonzales (Director of Transportation)
S. Gail Goldberg, AICP (Director of Planning)

CITY OF SAN DIEGO

MAR 29 2002

PLANNING DEPARTMENT

The following comments on the DEIR for the City of Villages Growth Strategy and Strategic Framework Element (referred to herein as the "Plan") relate specifically to transportation. The Plan reflects the City's proposed approach to accommodate the additional population growth out to the year 2020. Although the DEIR concludes that the transportation issue CAN NOT be *mitigated* at the general plan policy review stage, this IS the ONLY stage where such impact CAN (and must) be *minimized*.

aa-1 It is understood that the comments received must be on the DEIR vs the Plan -- and they are. A good EIR would include the analysis necessary and sufficient to derive the appropriate recommendations to be implemented to minimize the impact. If not now -- when? The DEIR does NOT do this; rather, it simply ignores THE most significant environmental impact. These nine pages attempt to *illustrate* an example of such a process, based on the limited data that is presently available to the writer.

Where the additional housing units will be sited has a significant effect on: (1) the additional number of automobiles per se. [which will need to be parked]; (2) the number of automobiles on the road during peak commute hours [thereby having a very significant influence on the cost of future transportation (i.e., road) improvements (e.g., widening) which will become necessary]; (3) the somewhat less critical (annual) vehicle miles traveled (VMT); and to some extent (4) air quality. Rather, the DEIR addresses this most key issue somewhat glibly -- e.g., "*the envisioned improved transit services is expected to result in significant gains (and) the expanded/improved 'world class' transit would become a realistic transportation choice for the majority of the region's residents*".

aa-2 Certain claims made in the DEIR regarding the Plan are not valid. It is not "*innovative*". Most of the designated sites are shopping centers/areas re-zoned instead for mixed use (e.g., the DEIR states that "*space for space replacement for parking with new village development may not occur and, therefore, could pose a significant impact*"). And it is not "*effective*". Rather, as will be shown, it is just the opposite. Whereas the traffic model that was used in the DEIR was SANDAG VMT -- it is the peak hours which are of most concern, and the distribution of sites designated for increased density need to be examined in relation to the presently existing work commute practices throughout the City.

aa-3 Despite the best of intentions, that MTDB is going to successfully preclude effects of increased traffic with "*world class*" public transportation in a timely manner, cannot be the underlying basis of the EIR. Rather, the most direct and cost effective approach to minimizing the traffic impact is to "*infill*" and/or "*re-develop*" those areas which already rely the least on the automobile for commuting. They are shown in the following Table (although not complete it does provide a representative cross section of the City).

STAFF RESPONSE aa-1: The distributed DEIR did determine that the traffic impacts could be *Aminimized@* or as stated *Apartially mitigated@*; however, due to continued (but reduced) expected future freeway congestion and to a lesser extent, lack of specificity, this minimalization or partial reduction of impacts would not reduce significant traffic impacts sufficiently to below a level of significance. Therefore, pursuant to CEQA, significant traffic impacts were determined to be unmitigated at this time. Also refer to previous Staff Responses A-10, A-11, and A-18.

The proposed Strategic Framework Element seeks to improve mobility in the City of San Diego through policy direction calling for an improved multi-modal transportation network. Specifically, the Element recommends that future steps be implemented to achieve a greatly improved transit system, pedestrian environment, and bicycle network, as well as targeted improvements to the street and highway system. This approach to mobility is endorsed in the Element as it was determined to be the best way to achieve the Element's Core Values@ related to mobility, as well as neighborhood character, urban form, and environmental protection. The Core Values were drafted through a citizens committee and an extensive public outreach process. (Refer to previous Staff Response B-15 for a list of Core Values.) The distributed DEIR analyzed this policy direction and found that this multi-modal approach will reduce the future growth in congestion, but will not fully mitigate the anticipated traffic impacts.

STAFF RESPONSE aa-2: The commenter's cited Aglibly@ addressing statement was taken from the Introduction chapter of the distributed DEIR (p. I-3). The distributed DEIR adequately disclosed the MTDB's Transit First plan (pp. I-2 through I-4), and the results of the regional traffic modeling which included an improved transit system and the existing transit system were addressed in the transportation impact discussion.

The proposed City of Villages growth strategy is considered *innovative@* as it is a creative approach to efficient infill and redevelopment. The use of shopping center sites for mixed use development would allow the City to provide needed housing while enhancing quality of life through the creation of village centers. The commenter is correct in stating that peak hour traffic is of the most concern when measuring the impact of congestion. Also, refer to previous Staff Response A-10.

STAFF RESPONSE aa-3: A successful Transit First is not the underlying basis of the EIR@. The distributed DEIR disclosed planned freeway improvements in SANDAG's 2020 Regional Transportation Plan which is expected to reduce the current 77 miles of freeway congestion to 29 miles in the year 2020. While MTDB's Transit First is an important component for the proposed City of Villages strategy to guide future growth and development, it is one of many considerations for the proposed strategy which includes goals for a more compact, mixed uses through infill and redevelopment with enhanced design, walkability, sense of community, useable public space, and energy efficiency.

Staff does not believe that future land use decisions should be based solely on traffic impacts. Rather, at the City and regional scale, a multi-modal transportation system should be designed to support desired/planned land use patterns. At the subsequent community plan level, a more detailed assessment should occur to determine the appropriate land use mix, density, and transportation improvements on any given site. The proposed Strategic Framework Element states that *A*Potential villages sites identified on the City of Villages map are intended to leverage growth to implement quality of life goals and amenities identified by the public (p. 35 of March 2002 draft Element).@ A full listing the factors considered when determining the locations of villages and transit corridors, is also found on this page 35 of the draft Element. In addition, staff does not concur that choosing village sites, based on their existing degree of auto-dependence, is the best way to minimize future traffic impacts. Staff reviewed the commenter's cited Natural Resources Defense Council (NRDC,) study and was encouraged by the study's findings that household density and transit accessibility can dramatically reduce vehicle miles traveled. This type of data will be useful information for use in future, village-specific environmental impact analysis.

As shown Figure 1, there is a statistically significant relationship between vehicles per housing unit and the means used to commute -- but as shown in Figure 2, the mean (i.e., average) commute time is independent of the means used (approximately 20-minutes, with a range of ± 4.5-minutes).

aa-4 And as discussed on p. 6, a recent study (based on the 1990 census) found that (total annual) vehicle miles traveled (VMT) per household was NOT statistically significant compared to household income. Rather, it (VMT) was found to be related to a combination of housing density, and transit accessibility.

UDAP area* 1990 census data [2000 data should be quite similar]	% of workforce commuting by means other than automobile	Mean travel time to work – minutes (vs Table B-1 DEIR)
Barrio Logan	77.2 (0.9 vehicles per housing unit)	22.2 (+ 1.9 minutes w/r/t avg)
Centre City	64.2 (0.5 vehicles per housing unit)	22.8 (+ 2.5 minutes w/r/t avg)
----- 50% breakpoint -----		
Midway – Pacific Hwy	34.5 (1.1 vehicles per housing unit)	15.7
Old San Diego	33.0 (1.3 vehicles per housing unit)	17.0
Golden Hill	26.9 (1.2 vehicles per housing unit)	22.4 (+ 2.1 minutes w/r/t avg)
----- 25% breakpoint -----		
Mission Beach	22.5 (1.7 vehicles per housing unit)	19.3
La Jolla	19.3 (2.0 vehicles per housing unit)	19.0
College Area	19.3 (1.8 vehicles per housing unit)	17.3
San Ysidro	19.1 (1.5 vehicles per housing unit)	23.3 (+ 3.1 minutes w/r/t avg)
City Heights	18.3 (1.2 vehicles per housing unit)	22.6 (+ 2.3 minutes w/r/t avg)
Ocean Beach	17.2 (1.4 vehicles per housing unit)	19.7
North Park	15.0 (1.3 vehicles per housing unit)	19.4
----- 15% breakpoint -----		
Linda Vista	14.5 (1.7 vehicles per housing unit)	18.0
Pacific Beach	14.2 (1.6 vehicles per housing unit)	19.9
Normal Heights	13.8 (1.4 vehicles per housing unit)	20.4 (+ 0.1 minutes w/r/t avg)
Peninsula	13.7 (1.8 vehicles per housing unit)	17.9
Mid City Eastern	13.1 (1.7 vehicles per housing unit)	21.6
Otay – Nestor & Otay Mesa	11.4 (2.0 vehicles per housing unit)	23.9 (+ 3.6 minutes w/r/t avg)
----- 10% breakpoint -----		
Clairemont Mesa	9.7 (2.0 vehicles per housing unit)	18.3
Kensington - Talmadge	9.6 (1.7 vehicles per housing unit)	18.2
Kearny Mesa	8.4 (1.5 vehicles per housing unit)	15.9
Navajo	7.4 (2.1 vehicles per housing unit)	21.3 (+ 1.0 minutes w/r/t avg)
Carmel Valley & Sorrento Hills	7.1 (2.1 vehicles per housing unit)	21.3 (+ 1.0 minutes w/r/t avg)
Rancho Penasquitos	7.0 (2.2 vehicles per housing unit)	24.3 (+ 3.0 minutes w/r/t avg)
Mira Mesa	6.9 (2.2 vehicles per housing unit)	21.2 (+ 0.9 minutes w/r/t avg)
Rancho Bernardo	6.1 (1.8 vehicles per housing unit)	23.4 (+ 3.1 minutes w/r/t avg)
Mission Valley	6.1 (1.5 vehicles per housing unit)	17.5
Carmel Mtn & Sabre Springs	5.6 (2.0 vehicles per housing unit)	23.9 (+ 3.6 minutes w/r/t avg)
* UDAP = User Defined Areas Program. Table includes only those Community Planning Areas with a UDAP Summary File "on-line"		20.3 average (of each of the means)

Although a UDAP Summary File is not available "on-line" for ALL of the Community Planning Areas, the data available is deemed to be an amount and type "necessary and sufficient" for the purposes intended herein.

As the values in Fig. 1 have been derived from UDAP data (vs tabulated per se. therein) it is deemed noteworthy that the regression goes to zero vehicles per household, for 100% of workforce commuting without one.

STAFF RESPONSE aa-4: The proposed City of Villages strategy seeks to create activity centers of higher densities with good transit accessibility. As stated above (previous Staff Response aa-3), based on the NRDC study cited, this type of environment should result in reduced vehicle miles traveled and increased transit ridership, further reducing potential project-specific traffic and air quality impacts and parking effects of future village projects.

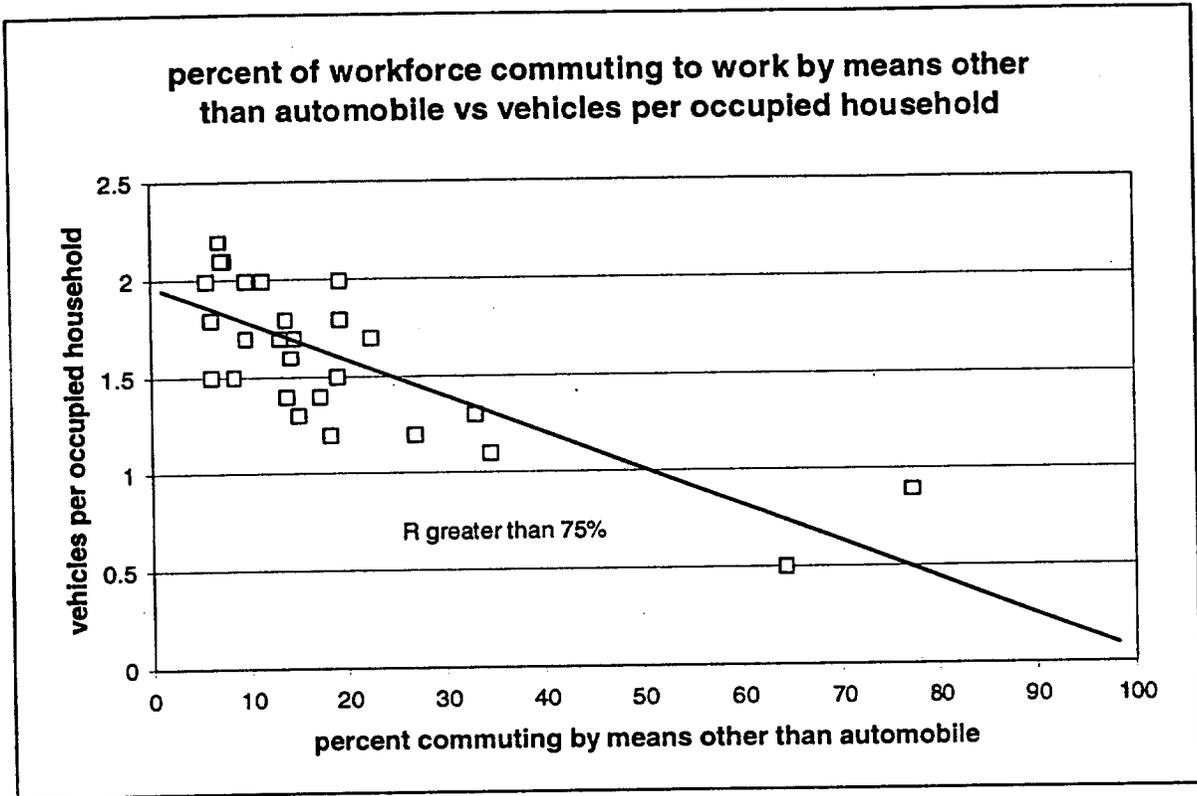


Figure 1

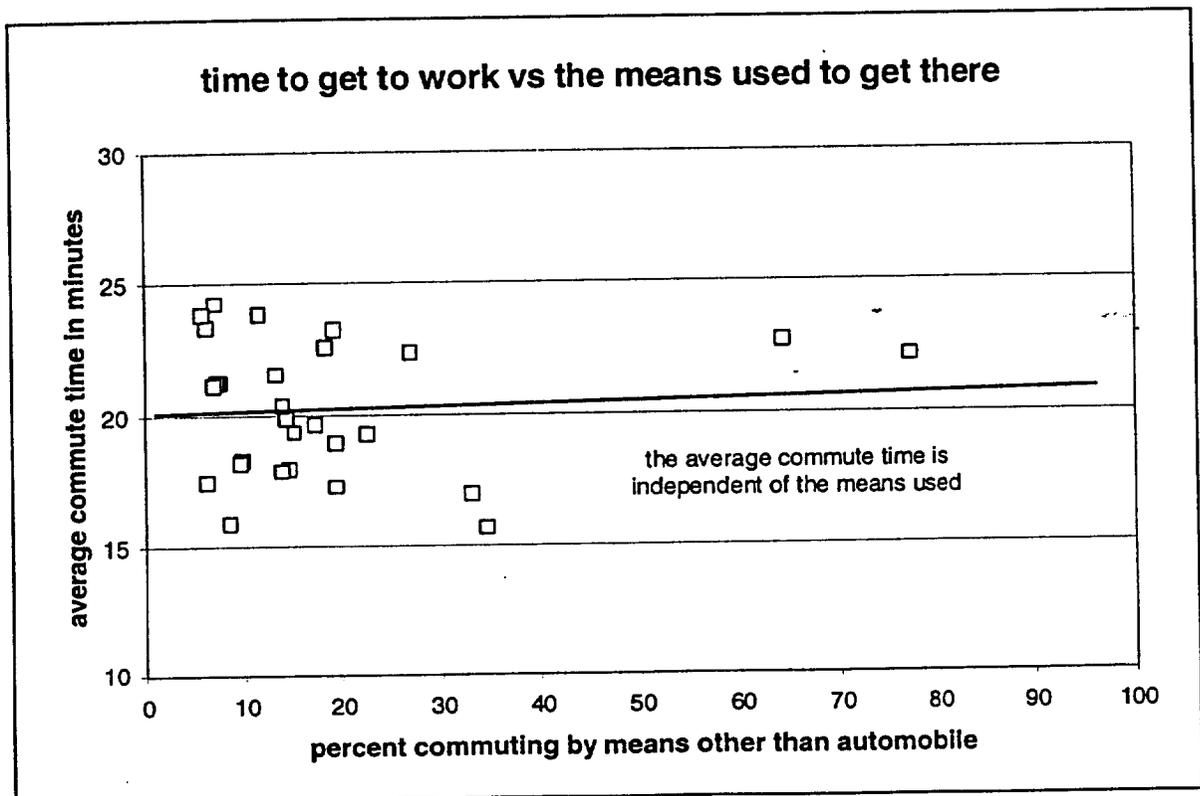


Figure 2

The following is an example of "optimizing" increased density vs the present commuting practices

NOTES:

- (1) The present designation for Centre City is the same as future villages and transit corridors. That is, areas which **COULD** increase in density/intensity **AFTER** 2020 -- but with no present intent to increase the housing density/intensity over that presently called for in the existing Community Plans
- (2) As the DEIR provides no data regarding acreage or number of units to be accommodated in each designated center/corridor, the following is based on quantity per se. (with limited weighting as shown)
- (3) A similar analysis based on approximate area of each is shown in the Appendix, with similar results

aa-5

Community Planning Area(s) having a UDAP Summary File	% "non-auto"	relative "village distribution"	relative "village distribution"
		ideal -- based on % non-auto relative # ≈ 3 (ln %) - 4	actual - # designated per area 45 units/acre = 1.0 75 units/acre = 1.5
Barrio Logan	77.2	9	1
Centre City	64.2	8.5	0
Midway - Pacific Hwy	34.5	6.5	1
Old San Diego	33.0	6.5	1
Golden Hill	26.9	6	2
Mission Beach	22.5	5.5	0
La Jolla	19.3	5	0
College Area	19.3	5	0
San Ysidro	19.1	5	1.5
City Heights	18.3	4.5	0
Ocean Beach	17.2	4.5	3
North Park	15.0	4	4
Linda Vista	14.5	4	1
Pacific Beach	14.2	4	5
Normal Heights	13.8	4	0
Peninsula	13.7	4	0
Mid City Eastern	13.1	3.5	2
Otay - Nestor & Otay Mesa	11.4	3.5	7
Clairemont Mesa	9.7	3	7
Kensington - Talmadge	9.6	3	0
Kearny Mesa	8.4	2.5	3
Navajo	7.4	2	6
Carmel Valley & Sorrento Hills	7.1	2	2
Rancho Penasquitos	7.0	2	3
Mira Mesa	6.9	2	5
Rancho Bernardo	6.1	1.5	1
Mission Valley	6.1	1.5	9
Carmel Mtn & Sabre Springs	5.6	1	4

The Table above and Figure 3 show a distribution for population growth which mitigates (to the extent practical) the impact of increased traffic. There is at least one "densification unit" per area, with a logarithmic progression to those areas least dependent on the automobile. By comparison (see Table above and Figure 4) the actual distribution of sites presently designated is just the opposite. Indeed, as most of the sites designated in the plan are simply already developed shopping areas being changed instead to mixed-use, it also acerbates the non-peak week-day hours and week-ends (viz., VMT).

aa-6

STAFF RESPONSE aa-5: Centre City is shown on the draft City of Villages Map as the ARegional Center. The proposed Element calls for Athe further intensification of Downtown to increase its role as a regional hub by maintaining and enhancing its role as the pre-eminent business center in this region and developing as a major urban residential center (p.31 of March 2002 draft Element). The final draft Element will clarify that the region=s highest density housing is encouraged downtown. In addition, the final draft of the Strategic Framework Element Action Plan will outline a AMonitoring Program@ that includes monitoring progress toward achieving A2020 Housing Goals by Community Planning Area. These housing goals will appear in a table format as Appendix A of the Action Plan. For Centre City, the goal is 6,585 to 10,585 units above the existing community plan. These numbers would be refined through the Centre City Community Plan update, currently underway.

STAFF RESPONSE aa-6: The commenter=s statement Amitigates (to the extent possible)@ is not inconsistent with the significance determination of the distributed DEIR; however, pursuant to CEQA Guidelines and the City=s criteria, maximized mitigation may not be sufficient to reduce the impact to below a level of significance. Refer to previous Staff Responses aa-1, aa-3, and aa-4.

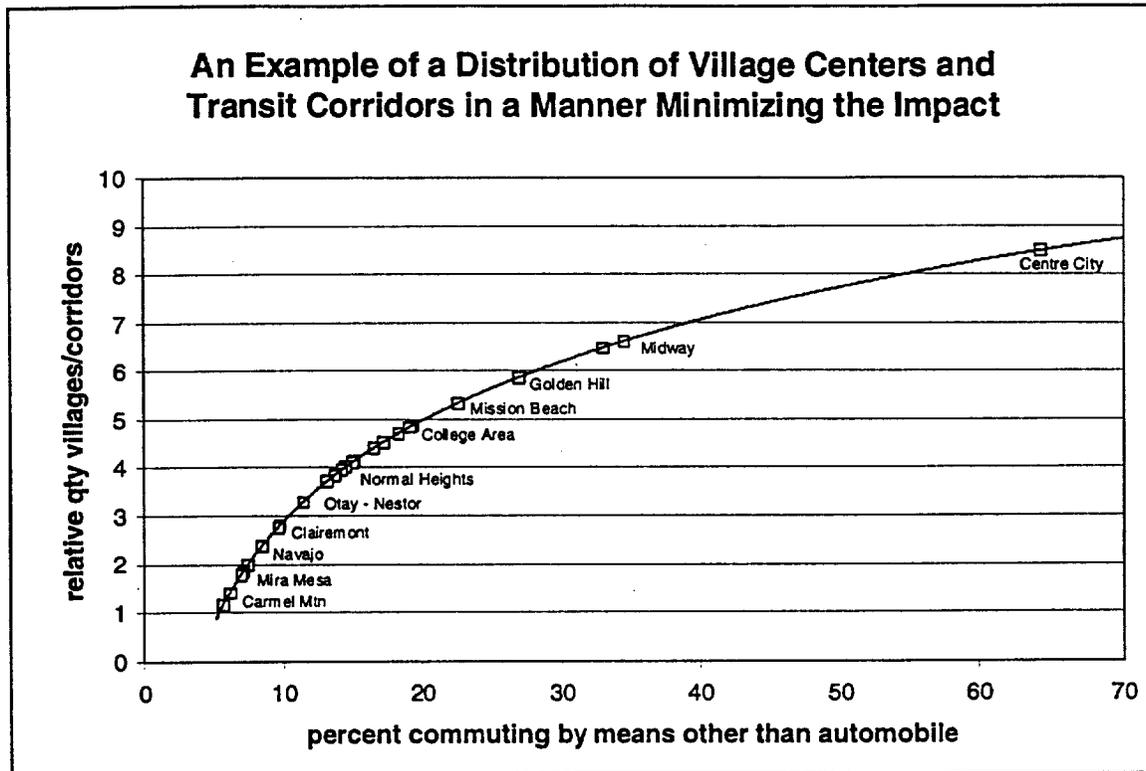


Figure 3

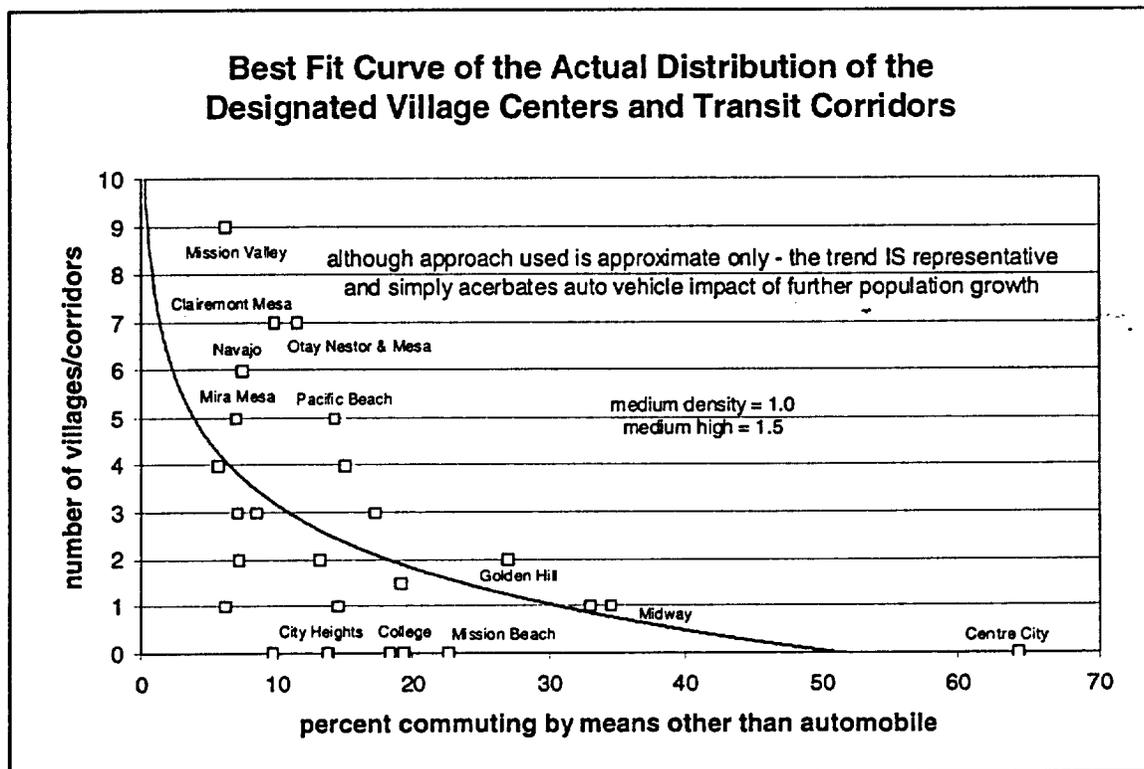


Figure 4

SUMMARY and CONCLUSIONS

aa-7 The Mayor has expressed his desire to use this once in a lifetime opportunity, to change the direction of City land use policy. By comparison however, by targeting the future population growth into areas that are the most (vs least) dependent on the automobile, it promulgates (for the next 20-years) the same pattern of use followed for the past half-century. That is hardly "innovative" and "effective" and the DEIR admits (p. IV-32) that only about 6% of the increased traffic will be mitigated by transit and/or walking.

Although VMT is a concern, traffic at peak traffic hours (during commute) is much more critical. Both however, may be minimized by attempting to allocate the sites of increased density into those areas which rely the least on automobiles (vs existing shopping centers almost exclusively). The time for that to occur is BEFORE the Strategic Framework Element becomes the mandatory 20-year Plan. Figure 5 (page 8) also shows "relative intensity" based on acreage. Not only is it more non-optimum than that in Figure 4, as the designated acreage is ten-times greater than that actually required, if actual growth proceeds willy-nilly, the impact regarding traffic could actually be much worse than that indicated. Thus:

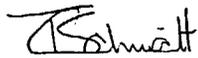
- aa-8**
- (1) The map(s) need to provide for increased density in some communities which have been exempted
 - (2) As opposed to simply "leaving it up to the developers", the EIR must specify maximum allowable build-outs for each community (viz., see *illustrative example* provided on page 9)
 - (3) That a density allocation which minimizes traffic impact to the extent practical, has been effectively achieved in (1) and (2) above, needs to be quantified in the final version of the EIR
 - (4) Except for the following, the maximums must become a sacrosanct aspect of the Community Plans
 - (5) To remain effective, the EIR should call for the Plan to require periodic reassessments at 5-year intervals, based on changes in commuting practices which occur due to public transportation actually being provided and used -- vs wishful thinking only

NOTE. The results of the illustrative analyses herein are similar to those in a study done by NRDC entitled "Using Residential Patterns and Transit To Decrease Auto Dependence and Costs". Using the 1990 census, it compared 11 communities in the San Francisco area, 8 in the Los Angeles area, 5 in the San Diego area (including Clairemont) and 3 in Sacramento. They looked at household income, number of vehicles owned, and annual household VMT (vs means of commute). The correlations that were found, were with density, as follows.

- autos/household = 2.7 divided by the 1/4 power of housing density (with a 92% correlation coefficient)
- vehicle-miles/household = 34.3 K divided by the 1/4 power of density, divided by the 1/13 power of TAI (with a 90% correlation coefficient) -- where TAI is a measure of "transit accessibility" (assuming that the average public transit passenger will walk 1/4 mile to a bus stop or 1/2 mile to a rail and/or ferry station)

aa-9 Of the 27 communities studied, the TAI for Clairemont was in the bottom one-third (and the Neighborhood Shopping Index and Pedestrian Accessibility Index were in the bottom one-quarter, with the following description). *"Most neighborhood shopping is concentrated in two shopping centers and along Clairemont Drive and Clairemont Mesa Blvd. Pedestrian impediments include a broken and curvy street grid with many dead-end streets, especially adjacent to canyons and freeways, and buildings set back from sidewalks, both of which substantially increase walking distances. The high traffic speeds accompanying the long blocks and lack of stoplights and the 4-way stop signs at most intersections compromises pedestrian safety. The community is served by six San Diego bus routes."*

Respectfully submitted,



T.C. Schmidt

STAFF RESPONSE aa-7: The traffic modeling results have been reconsidered and the commenter=s cited reported six percent included the percentage of total trips representing people who walk to use the transit; the revised percentage is nine percent. In addition, employment and a refined system of transit was modeled; this modeling resulted in transit/walking trips approaching ten percent. These revised numbers have been added to the revised tables in the Final EIR.

Refer to previous Staff Response aa-2. In addition, please note that the draft City of Villages Map does not represent a Mandatory 20-year plan.@ The village locations, densities, mix of uses, facilities needs, and designs will be refined at the community plan and/or project design levels.

STAFF RESPONSE aa-8: Many of the communities that commenter suggests should be targeted for future growth are already identified as potential villages and transit corridors on the draft City of Villages map. More precise village locations, densities, design guidelines, and environmental analysis will be determined at the subsequent community plan and/or project design level.

The final draft of the proposed Strategic Framework Element Action Plan will outline a Monitoring Program@ that includes monitoring progress toward achieving A2020 Housing Goals by Community Planning Area.@ These housing goals will appear in a table format as Appendix A of the Action Plan. When subsequent community plan amendments or updates require second-tier EIR=s, these EIR=s would consider these Action Plan housing goals to refine cumulative impacts.

Refer to previous Staff Responses aa-3 and aa-4.

Community plans are not static documents; they change over time in response to the needs of the City, desires of the citizens, and actions of the City Council. The proposed Strategic Framework Element does not impose density maximums on any community plan area.

The proposed Strategic Framework Element Action Plan includes a section on Monitoring. The Monitoring plan will measure progress toward attainment of ASan Diego Sustainable Community Program Indicators@ among other factors. These indicators address traffic congestion, including measures of Apercent of residences within 0.25 miles of public transit@ and Apercent of San Diegans who rideshare to work (carpooling, transit).@

STAFF RESPONSE aa-9: Refer to previous Staff Response aa-3 (Paragraph 2). It should be noted that the City is currently revising its Traffic Design Manual; the revisions include traffic calming measures that could be applied to potential village sites which currently are not pedestrian friendly.

APPENDIX – Estimation of relative density/intensity of the designated villages and corridors per the present City of Villages Growth Strategy

For build-out to **only one-third** of the maximum designated, communities potentially seeing growth greater than 20% by the year 2020 are shown in **bold**

Community Planning Area(s)	approximate acres (villages & corridors) and maximum number of units per acre	additional build-out (# units) based on maximum allowed	# of housing units - 1990 (per UDAP)	% increase in density of Community	% of total increase in add'l units	relative intensity 0-9 scale
Barrio Logan	20 acres at 45 units/acre	900	938	100 %	0.4 %	0.15
Centre City	0	0	6,661	0	0	0
Midway – Pacific Hwy	175 acres at 45 units/acre	7,875	1,760	450 %	3.5 %	1.25
Old San Diego	5 acres at 45 units/acre	225	410	55 %	0.1 %	0.05
Golden Hill	35 acres at 45 units/acre	1,575	6,994	20 %	0.7 %	0.25
Mission Beach	0	0	3,626	0	0	0
La Jolla	0	0	14,279	0	0	0
College Area	0	0	6,822	0	0	0
San Ysidro	50 acres at 45 units/acre 100 acres at 75 units/acre	9,750	6,649	145 %	4.3 %	1.5
City Heights	0	0	24,396	0	0	0
Ocean Beach	80 acres at 45 units/acre	3,600	7,258	50 %	1.6 %	0.6
North Park	5 acres at 45 units/acre 35 acres at 75 units/acre	2,850	24,123	10 %	1.2 %	0.4
Linda Vista	125 acres at 75 units/acre	9,375	13,151	70 %	4.1 %	1.5
Pacific Beach	225 acres at 45 units/acre	10,125	21,467	45 %	4.4 %	1.6
Normal Heights	0	0	7,913	0	0	0
Peninsula	0	0	16,501	0	0	0
Mid City Eastern	150 acres at 45 units/acre	6,750	13,320	50 %	3.0 %	1.1
Otay - Nestor & Otay Mesa	650 acres at 45 units/acre	29,250	17,081	170 %	12.9 %	4.6
Clairemont Mesa	450 acres at 45 units/acre	20,250	32,349	65 %	8.9 %	3.2
Kensington - Talmadge	0	0	6,758	0	0	0
Kearny Mesa	100 acres at 45 units/acre	4,500	462	975 %	2.0 %	0.7
Navajo	160 acres at 45 units/acre	7,200	20,316	35 %	3.2 %	1.1
Carmel Valley & Sorrento Hills	75 acres at 45 units/acre	3,375	4,976	65 %	1.5 %	0.5
Rancho Penasquitos	320 acres at 45 units/acre	14,400	14,255	100 %	6.4 %	2.3
Mira Mesa	480 acres at 45 units/acre	21,600	19,743	110 %	9.5 %	3.4
Rancho Bernardo	125 acres at 45 units/acre	5,625	16,797	35 %	2.5 %	0.9
Mission Valley	750 acres at 75 units/acre	56,250	5,509	1000 %	25 %	9
Carmel Mtn & Sabre Springs	240 acres at 45 units/acre	10,800	3,354	325 %	4.8 %	1.7
		226,275 total	317,868 total		100 % total	

For build-out to one-third of the maximum, additional units (neglecting the other 20 planning areas) is double the maximum need anticipated. Although UDAP data is only available for 60% of the community planning areas, the mix or "spread" is considered to be very representative.

City of Villages Growth Strategy

Relative intensity of growth distribution vs commute pattern
based on (1) # per community (Fig 4) and (2) estimates of acreage

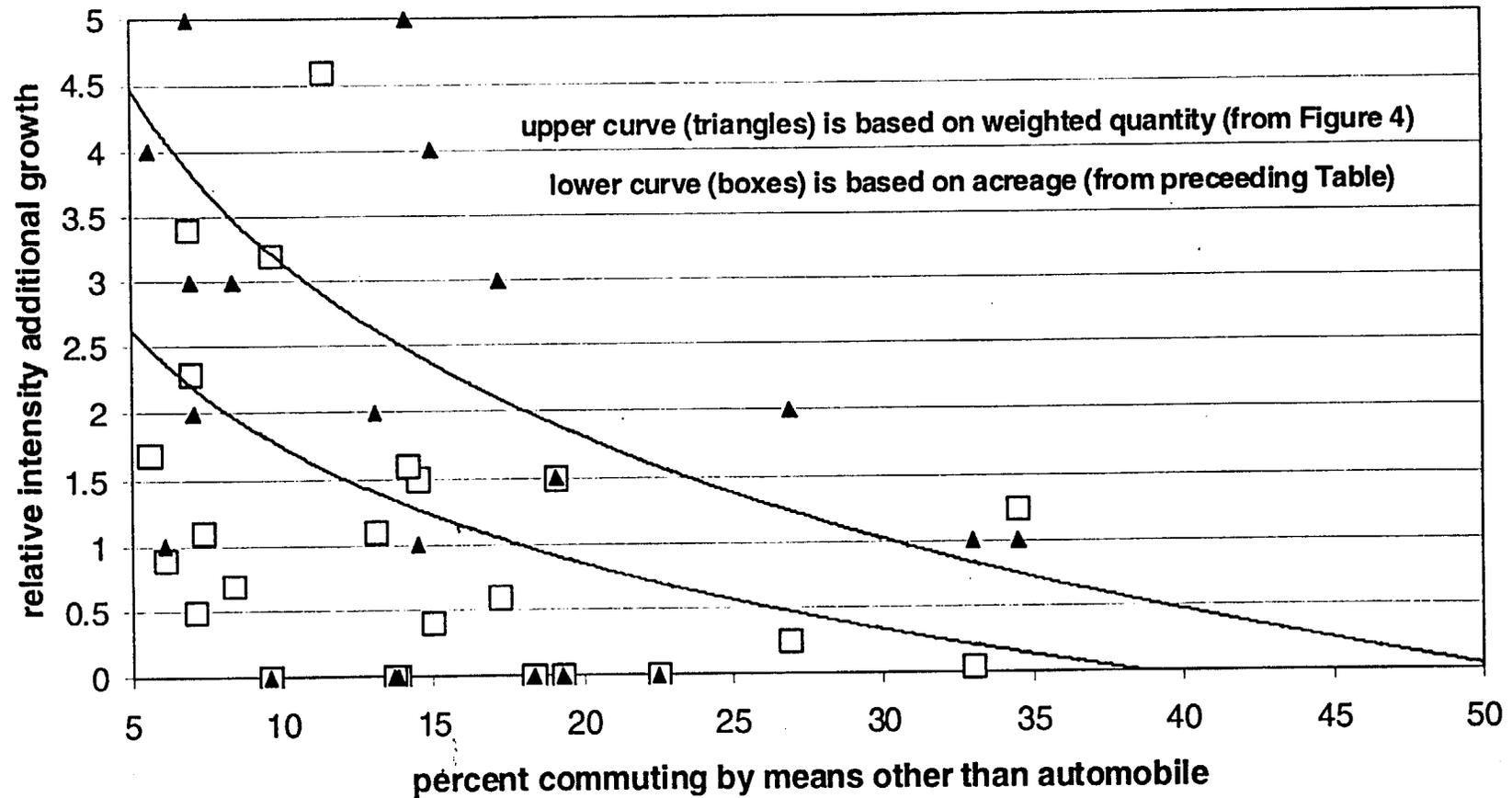


Figure 5

APPENDIX – Theoretical distribution of the designated villages and corridors to minimize automobile impact based on commute pattern

Based on the example distribution also deemed practical, communities potentially seeing growth greater than 20% by the year 2020 are shown in **bold**

Community Planning Area(s)	approximate number of acres based on 45 units/acre	Additional build-out (# units) based on required amount only	# of housing units - 1990 (per UDAP)	% increase in density of Community	relative intensity 0-9 scale	% commute non-auto
Barrio Logan	38	1700	938	180 %	9.00	77.2
Centre City	36	1600	6,661	24 %	8.45	64.2
Midway – Pacific Hwy	28	1260	1,760	70 %	6.58	34.5
Old San Diego	27	1220	410	300 %	6.45	33.0
Golden Hill	25	1100	6,994	16 %	5.83	26.9
Mission Beach	23	1000	3,626	27 %	5.30	22.5
La Jolla	21	920	14,279	6 %	4.84	19.3
College Area	21	920	6,822	13 %	4.84	19.3
San Ysidro	21	920	6,649	14 %	4.81	19.1
City Heights	20	900	24,396	4 %	4.68	18.3
Ocean Beach	19	860	7,258	12 %	4.49	17.2
North Park	18	780	24,123	3 %	4.08	15.0
Linda Vista	17	760	13,151	6 %	3.98	14.5
Pacific Beach	17	760	21,467	4 %	3.92	14.2
Normal Heights	17	740	7,913	9 %	3.83	13.8
Peninsula	17	740	16,501	5 %	3.81	13.7
Mid City Eastern	16	700	13,320	5 %	3.68	13.1
Otay – Nestor & Otay Mesa	14	620	17,081	4 %	3.26	11.4
Clairemont Mesa	12	540	32,349	2 %	2.78	9.7
Kensington - Talmadge	12	520	6,758	8 %	2.74	9.6
Kearny Mesa	11	460	462	100 %	2.34	8.4
Navajo	9	380	20,316	2 %	1.96	7.4
Carmel Valley & Sorrento Hills	8	360	4,976	7 %	1.84	7.1
Rancho Penasquitos	8	340	14,255	3 %	1.80	7.0
Mira Mesa	8	340	19,743	2 %	1.75	6.9
Rancho Bernardo	6	260	16,797	2 %	1.38	6.1
Mission Valley	6	260	5,509	5 %	1.38	6.1
Carmel Mtn & Sabre Springs	5	220	3,354	7 %	1.13	5.6
	480 total	21,620 total	317,868 total			

The total shown (21.6 K) is the maximum predicted necessary -- assuming the balance of units go into the 20 planning areas not shown due to lack of data

3/25/02

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 melvin.shapiro@worldnet.att.net

Fax to Anne Lowry
 Comments on Strategic Framework EIR:

- bb-1 | 1) I repeat my previous comments submitted with the Notice of Preparation.
- bb-2 | 2) Page I-8 says 200,000 people will be added by 2020. City of Villages-
 General Plan, page 38, says city will grow by 349,000 people. Please explain.
- bb-3 | 3) Page iii-Transportation-predicts worse traffic congestion. One of the
 mayor's goals is less traffic congestion. His City of Villages goal conflicts
 with his traffic goal.
- bb-4 | 4) Page iv-Solid Waste-inadequate landfills for disposal. It says this impact
 cannot be mitigated.
- bb-5 | 5) Page V-1. "potentially overburdens public facilities and services."
 6) EIR check list includes a discussion of Housing. This is in every Negative
 Declaration, but it is not included in Environmental Analysis-section IV. This
 should be explained. Instead, there is a discussion of housing in the
 Introduction-Section I. The discussion is inadequate. It should address the
 concerns expressed in my comments with the Notice of Preparation..
- bb-7 | 7) In view of items listed above #3,4,5, it would be preferable to adopt an
 Alternative.

STAFF RESPONSE bb-1: Refer to Staff Response B-2.

STAFF RESPONSE bb-2: Refer to Staff Response B-2.

STAFF RESPONSE bb-3: Refer to Staff Response A-10.

STAFF RESPONSE bb-4: Comment Noted.

STAFF RESPONSE bb-5: Comment Noted.

STAFF RESPONSE bb-6: Refer to Staff Response B-5.

STAFF RESPONSE bb-7: Comment Noted.