



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: March 10, 2009

PUBLIC NOTICE OF PREPARATION

OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND A PUBLIC EIR SCOPING MEETING  
JO: 43-0048

The City of San Diego Entitlements Division will prepare a draft Program Environmental Impact Report for the following project and is inviting your comments regarding the scope and content of the document. **Your comments must be received by 30 days after receipt of this notice.** Please send your written comments to the following address: **Marc Cass, Environmental Planner, City of San Diego, Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to [MCass@sandiego.gov](mailto:MCass@sandiego.gov) with the Project Number (146248) in the subject line.**

**SCOPING MEETING:** A scoping meeting will be held by the City of San Diego, Entitlements Division on Wednesday, March 25<sup>th</sup> from 5:00 to 7:00 p.m. at the Mission Valley Branch Library located at 2123 Fenton Parkway, San Diego, CA 92108- (858) 573-5007. Verbal and written comments regarding the scope and alternatives of the proposed Environmental Impact Report (EIR) will be accepted at the meeting. Written comments may also be sent to Marc Cass, City of San Diego, Development Services Department, 1222 First Avenue, MS 501, San Diego, CA, 92101 or emailed to [mcass@sandiego.gov](mailto:mcass@sandiego.gov) with the Project Number (146248) in the subject line.

**General Project Information:**

- Project No. **146248**, SCH No. **Pending**
- Community Plan Area: **Navajo Community Planning Area, Tierrasanta Community Planning Area**
- Council District: **7**

**SUBJECT: GRANTVILLE MASTER PLAN-SUBAREA B AMENDMENT; RIVER PARK AT MISSION GORGE PROJECT; SHAWNEE CG7600 MASTER PLAN; GENERAL PLAN and COMMUNITY PLAN AMENDMENT to amend the Tierrasanta and Navajo Community Plans to incorporate a master plan for Subarea B of the Grantville Redevelopment Project Area and to eliminate the extension of Tierrasanta Boulevard to Princess View Drive ; a REZONE to implement the changes in land use; an MHPA BOUNDARY LINE ADJUSTMENT to adjust the geographical boundaries of the Multi-Habitat Planning Area; a VESTING TENTATIVE MAP to allow the subdivision of 13 existing lots into 83 lots; a MASTER PLANNED DEVELOPMENT PERMIT to allow deviations from the proposed base zones; a SITE DEVELOPMENT PERMIT to allow development on a site that supports Environmentally Sensitive Lands and an amendment to existing CONDITIONAL USE PERMIT No. 82-0611 which authorizes the Mining and Extraction operations that are currently in operation. Within the 505-acre Subarea B, two projects are being proposed. The River Park at Mission Gorge site is 364.6 acres and is located at 7500 Mission Gorge Road, adjacent to and north of Mission Gorge Road, starting from just north of Old Cliffs Road on the western portion of the property and extending to Margerum Road on the eastern portion. The project would consist of the demolition of various industrial and commercial structures and allow a mix of land uses consisting of approximately 67.4-acres of Residential Use, 5.5-acres of Mixed-Use, 72.8-acres of a variety of Employment Uses, such as Institutional, Commercial, Office and Industrial; 20.7-acres of Open Space Parks; and 167.2-**

acres of Resources Based Open Space with the remaining 31-acres for construction of streets; The residential component of the project would allow for a maximum density of 2,156 residential units. The majority of the development would be located on the south side of the river with a single roadway crossing over the San Diego River to allow access to a smaller portion of the Industrial/Employment on the north side of the river. The Shawnee project site is a 24-acre site located adjacent to the eastern portion of the River Park at Mission Gorge site. The project proposes approximately 14.2-acres of Multi-Family and Single-Family residential uses allowing 1,023 dwelling units consisting of 999 multi-family units and 24 single-family units. The Shawnee project would also include 3.32-acres of Open Space Park. River Park Legal Description: Portion of Lot 53 of Rancho Mission of San Diego Map 330, Portions of Lots 1 through 8 and 14 through 16 of Map 1550, Inclusive of Rancho Mission of San Diego, Portion of Lot e and C of the Subdivision of a portion of Lot 70 of the Rancho Mission of San Diego SCC 15191, all in the City of San Diego, County of San Diego, State of California, as described in deed recorded December 31, 2003 as document No. 2003-1525326.

**Applicant:** J.J.B. Land Company L.P.

**Recommended Finding:** The recommended finding that the project may have a significant effect on the environment is based on an Initial Study. The following issue areas that have been identified include:

**Land Use, Transportation/Traffic Circulation/Parking, Biological Resources, Air Quality, Global Warming, Growth Inducement, Landform Alteration/Visual Quality/Community Character, Health and Safety, Mineral Resources, Noise, Public Services and Facilities, Public Utilities, Hydrology, Water Quality, Geology/Soils, Cumulative Effects, Paleontological Resources, Population and Housing, and Historical Resources (Archaeology).**

**Availability in Alternative Format:** To request this Notice, the Scoping Letter, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information, contact Marc Cass at (619) 446-5330. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact Project Manager Jeanette Temple at (619) 557-7908. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego web-site (<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>), and distributed on March 10<sup>th</sup>, 2009.

Cecilia Gallardo, AICP  
Assistant Deputy Director  
Development Services Department

- Attachments:** Figure 1: Regional Vicinity Map  
Figure 2: Subarea B/RiverPark at Mission Gorge Project Site/ Shawnee Project Site  
Figure 3: Shawnee Site Plan  
Figure 4: River Park at Mission Gorge Site Plan

Distribution:

Federal Government:

- Federal Aviation Administration (1)
- US Department of Transportation (2)
- US Department of Housing & Urban Development (7)
- Environmental Planning Division Naval Facilities (12)
- U.S. Army Corps of Engineers (16)
- U.S. Environmental Protection Agency (19)
- U.S. Fish & Wildlife Service (23)
- U.S. Army Corps of Engineers (26)

State of California

- California Department of Transportation Planning - CALTRANS (31)
- California Department of Fish & Game (32)
- California Integrated Waste Management Board (35)
- State Department of Health Services – Environmental Management (36)
- State Department of Health Services – Noise Control (37)
- California Environmental Protection Agency (37A)
- Housing and Community Development Department (38)
- Department of Toxic Substance Control (39)
- California Department of Parks and Recreation (40)
- Resources Agency (43)
- Regional Water Quality Control Board: Region 9 (44)
- Department of Water Resources (45)
- State Clearinghouse (46)
- Air Resources Board (49)
- Office of Attorney General (50)
- State Water Resources Control Board (55)
- Native American Heritage Commission (56)
- Office of Planning and Research (57)
- California Energy Commission (59)
- California Department of Conservation (61)
- California State Lands Commission (62)

County of San Diego

- Air Pollution Control District (65)
- San Diego County Tax Assessor (67)
- Department of Planning and Land Use (68)
- Department of Park and Recreation (69)

Department of Public Works (70)  
County Water Authority (73)  
Department of Environmental Health Services (74)  
Department of Environmental Health Services – Hazardous Material (75)  
Department of Environmental Health – Land and Water Quality Division (76)

City of San Diego

Mayor's Office (91)  
Councilmember Peters, District 1  
Councilmember Faulconer, District 2  
Councilmember Atkins, District 3  
Councilmember Young, District 4  
Councilmember Maienschein, District 5  
Councilmember Frye, District 6  
Councilmember Maddafer, District 7  
Councilmember Hueso, District 8  
City Attorney's Office, Shannon Thomas  
Park and Recreation Board (77)\  
Tony Gangitano, MMC (77A)  
Fire and Life Safety Services (79)  
Library Department – Government Documents (81)  
Steve Fontana, Environmental Services Department (80)  
Park and Recreation Board (83)  
Police Research & Analysis (84)  
Real Estates Assets (85)  
Engineering & Capital Projects (86)  
Historic Resources Board (87)  
Wetland Advisory Board (91A)  
Park Development (93)  
Lisa Wood, Environmental Services Department (93A)  
Jeanette Temple, Development Project Manager (MS 501)  
Bob Medan, Fire Plans Officer (MS 401)  
Jeff Harkness Parks and Open Space (MS 35)  
Julius Ocen, Engineering (MS 501)  
Jim Quinn, Geology (MS 401)  
Jeff Oakley, Landscape (MS 501)  
Chris Larson, Planning (MS 501)  
Ismael Elhamad, Transportation Development (MS 501)  
Janet King, Wastewater (MS 922)  
Dan Monroe, Long Range Planning (MS 4A)  
Jeanne Krosch, MSCP (MS 5A)  
George Adrain, Water Review (MS 906)  
Allison Sherwood, Environmental Analysis Section (MS 501)  
Martha Blake, Environmental Analysis Section (MS 501)  
Anne Jarque, Environmental Analysis Section (MS 501)  
Myra Herrmann, Environmental Analysis Section (MS 501)  
Ann Kern, Housing Commission

## Other Organizations and Interested Individuals

San Diego Association of Governments (SANDAG) (108)  
San Diego County Regional Airport Authority (110)  
San Diego Transit Corporation (112)  
San Diego Gas & Electric (114)  
Metropolitan Transit Board (115)  
San Diego Unified School District (125)  
San Diego City Schools (132)  
Daily Transcript (135)  
Environmental Health Coalition (169)  
San Diego Chamber of Commerce (157)  
Building Industry Federation (158)  
Environmental Law Society (164)  
Sierra Club (165)  
San Diego Audubon Society (167)  
Mr. Jim Peugh (167A)  
California Native Plant Society (170)  
Stuart Hurlbert (172)  
Center for Biological Diversity (176)  
Endangered Habitats League (182A)  
Community Planners Committee (194)  
Town Council Presidents (197)  
Community Planners Council (198)  
Carmen Lucas (206)  
Dr. Jerry Schaefer (209)  
San Diego State University, South Coastal Information Center (210)  
San Diego Archaeological Center (212)  
Save Our Heritage Organisation (214)  
Ron Christman (215)  
Clint Linton (215B)  
San Diego County Archaeological Society (218)  
Native American Heritage Commission (222)  
Kumeyaay Cultural Repatriation (225)  
Native American Distribution \* (225A-R)  
San Diego Natural History Museum (166)  
Friends of Adobe Falls (335)  
Navajo Community Planners, Inc. (336)  
Navajo Community Service Center (337)  
San Carlos Area Council (338)  
San Diego River Conservancy  
San Diego River Foundation / Coalition  
Del Cerro Senior Social Club (339)  
Mission Trails Regional Park (341)  
Tierrasanta Community Council (462)/(464)  
Murphy Canyon Community Council (463)  
East Elliot Planning Advisory Committee (466)  
City of Santee (466A)

Martin Flores, Rick Engineering  
Norman Arndt, Rick Engineering  
Michael Young, Rick Engineering  
Bobbi Herdes, RECON Environmental



## THE CITY OF SAN DIEGO

March 10, 2009

Arnold Veldkamp  
J.J. B. Land Company L.P.  
1508 West Mission Road  
Escondido, CA 92029

**SUBJECT:** SCOPE OF WORK FOR A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE GRANTVILLE MASTER PLAN-SUBAREA B AMENDMENT: RIVER PARK AT MISSION GORGE PROJECT and the SHAWNEE /CG7600 MASTER PLAN Project No. 146248) SCH No. Pending.

Dear Mr. Veldkamp:

The Environmental Analysis Section (EAS) of the Entitlements Division has conducted an Initial Study for the proposed Grantville Master Plan-Subarea B Amendment: RiverPark at Mission Gorge Project; Shawnee Project and has determined that the proposed project may have significant effects on the environment. Therefore, pursuant to the California Environmental Quality Act (CEQA), the preparation of a Program Environmental Impact Report (DEIR) is required. Further changes to the project, prior to release of the draft EIR, may affect the need to address the issues identified in this letter.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR should be prepared in accordance with the City's "Environmental Impact Report Guidelines," dated September 2002 and updated December 2005. A copy of the current guidelines is attached. The project issues to be discussed in the EIR are outlined below. A Notice of Preparation (NOP) will be distributed to the Responsible Agencies and others who may have an interest in the project. Consequently, changes or additions to this scope of work may be required as a result of input received in response to the Notice of Preparation.

Scoping meetings are required by CEQA section 21083.9 (a) (2) for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold. As such, you must coordinate with EAS staff to determine an appropriate location, date, and time for a scoping meeting which will be held to allow interested parties to help define the scope of the EIR by commenting on issues they believe should be included in the EIR.

### **Project Description:**

The proposed project site is an approximately 505-acre site described as Subarea B of the City of San Diego Grantville Redevelopment Project Area and is located along Mission Gorge Road in the Tierrasanta and Navajo Community Planning Areas of the City of San Diego. The site is situated just east of Interstate-15 and extends east along Mission Gorge Road. The site is bisected by the San Diego River and is situated just southwest of the Mission Trails Regional Park. Within the 505-acre Subarea B, two projects are being proposed: The River Park at

Mission Gorge site is 364.-6-acres and is located at 7500 Mission Gorge Road, adjacent to and north of Mission Gorge Road, starting from just north of Old Cliffs Road on the western portion of the property and extending to Margerum Road on the eastern portion. The project would consist of the demolition of various industrial and commercial structures and allow a mix of land uses consisting of approximately 67.4-acres of Residential Use, 5.5-acres of Mixed-Use, 72.8-acres of a variety of Employment Uses, such as Institutional, Commercial, Office and Industrial; 20.7-acres of Open Space Parks; and 167.2-acres of Resources Based Open Space with the remaining 31-acres for street use; The residential component of the project would allow for a maximum density of 2,156 residential units. The majority of the development would be located on the south side of the river with a single roadway crossing over the San Diego River to allow access to additional Industrial/Employment uses on the northern side of the river.

The Shawnee CG7600 Master Plan project site is a 24-acre site located adjacent to the southwest portion of the River Park at Mission Gorge site. The project proposes approximately 14.2-acres of Multi-Family and Single-Family residential uses allowing for a maximum of 1,023 dwelling units consisting of 999 multi-family units and 24 single-family units. The Shawnee project would also include 3.32-acres of Open Space Park.

**Discretionary Approvals:** GENERAL PLAN AMENDMENT, AMENDMENT TO THE TIERRASANTA COMMUNITY PLAN, AMENDMENT TO THE NAVAJO COMMUNITY PLAN, REZONE, MHPA BOUNDARY LINE ADJUSTMENT, VESTING TENTATIVE MAP, MASTER PLANNED DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, CONDITIONAL USE PERMIT.

**EIR Requirements:**

Each section and issue area of the EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation. The Draft EIR should also include sufficient graphics and tables to provide a complete description of all major project features. Please refer to the “Environmental Impact Report Guidelines,” updated December 2005, for additional details regarding the required information.

I. INTRODUCTION

Introduce the project with a brief discussion on the intended use and purpose of the EIR. This discussion should focus on the type of analysis that the Program EIR is providing. Provide an explanation of why it is necessary to implement the project. Provide projected time lines for the start and completion of the project. Describe and/or incorporate by reference any previously certified environmental documents that cover the project site including any Program EIRs. Briefly describe areas where the proposed project is in compliance or non-compliance with assumptions and mitigation contained in these previously certified documents. Provide a brief description of any other local, state and federal agencies that may be involved in the project review and/or any grant approvals.

II. ENVIRONMENTAL SETTING

Describe the precise location of the project and present it on a detailed topographic map and regional map. Additionally, include a map of both project specific proposals within Subarea B. Include a discussion of the existing conditions in Subarea B. Is the site currently developed? If so, provide a description of the development. Provide a local and regional description of the environmental setting of the project, as

well as the zoning and land use designations of the site and its contiguous properties, area topography, drainage characteristics, and vegetation. Include any applicable land use plans such as the City's MSCP/MHPA and other applicable open space preserves or overlay zones that affect the project site. Include a listing of any open space easements or building restricted easements that exist on the property. A description of other utilities that may be present on or in close proximity to the site and their maintenance accesses should be discussed, as well. This section should also include a brief description of the location of the closest police and fire stations along with their response times.

### III. PROJECT DESCRIPTION

Discuss the goals and objectives of the proposed project, in terms of public benefit (increase in housing supply, employment centers, etc.). Project objectives will be critical in determining the appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. As stated in CEQA Section 15124 (b), "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding consideration, if necessary. The statement of objectives should include the underlying purpose of the project." Describe all discretionary actions needed to implement the project (e.g. Community Plan Amendment, Planned Development Permit, Tentative Map, etc.) including all permits required from federal, state, and local agencies. Describe all the major project features, including density, grading (cut and fill), relocation of existing facilities, land use, retaining walls, landscaping, drainage design, improvement plans, including any off-site improvements, vehicular access points and parking areas associated with the project. Describe any off-site activities necessary to construct the proposed project. The EIR should include sufficient graphics and tables to provide a complete description of all major project features.

### IV. HISTORY OF PROJECT CHANGES

This section of the EIR shall chronicle the physical changes that have been made to the proposed project in response to environmental concerns raised during the City's review of the project.

### V. ENVIRONMENTAL ISSUES

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any significant impacts. Since the City of San Diego is the Lead Agency for this project, the EIR must represent the independent analysis of the Environmental Analysis Section (EAS). Therefore, all impact analysis must be based on the City's "Significance Determination Thresholds" dated January 2007. Below are key environmental issue areas that have been identified for this project, within which the issue statements must be addressed individually. Discussion of each issue statement should include an explanation of the existing project site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis should address potential direct, indirect, and cumulative impacts that could be created through implementation of the proposed project and its alternatives.

## Land Use

- Issue 1: Would the proposed project implement or result in a conflict with the goals, objectives, and recommendations of the City of San Diego General Plan, the Multiple Species Conservation Program, the Grantville Redevelopment Plan, the Draft San Diego River Park Master Plan, the Tierrasanta Community Plan or the Navajo Community Plan? How is the proposed project consistent with the land use designation, intensity of development, and environmental goals of these plans?**
- Issue 2: Would the proposed project require a deviation or variance?**
- Issue 3: Would the proposed project physically divide an established community?**
- Issue 4: Would the project propose land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?**

Provide a discussion on all applicable land use plans to establish a context in which the project is being proposed. Specifically, discuss how the project implements or fails to implement the goals, objectives, and recommendations of the General Plan, the Multiple Species Conservation Program, the Draft San Diego River Park Master Plan, the Grantville Redevelopment Plan, the Tierrasanta Community Plan and the Navajo Community Plan. Provide a detailed discussion of the proposed community plan amendments that would incorporate Subarea B of the Grantville Redevelopment Project Area. Ultimately, this section should identify any inconsistencies between the project as proposed and any adopted land use plan and whether the identified inconsistency would result in an environmental impact?

The project site is located wholly within the City of San Diego Multiple Species Conservation Program (MSCP) and is partially located within the MSCP's Multi-Habitat Planning Area (MHPA). Additionally, the project is located within a designated Regional Wildlife Corridor (San Diego River) within the MHPA. As currently proposed, the project appears to require an MHPA boundary line adjustment. Encroachment into the MHPA is allowed only where it can be shown that the adjusted MHPA are of equal or better biological value. Include a discussion of the existing MHPA lands on-site (acreage, quality, etc.) and a description of any requested MHPA boundary line adjustments. MHPA boundary line adjustments would require replacement MHPA lands. All replacement lands should be identified in terms of location and size.

Include a discussion and analysis as to the project's impacts to the wildlife corridor. Specifically, the MSCP Subarea Plan anticipates that any development that occurs would not preclude wildlife movement through this corridor. Provide a discussion as to whether the project complies with this MSCP direction.

The EIR shall evaluate the project's conformance with the final MSCP Plan (August 1998) and the City's MSCP Subarea Plan (March 2007), with specific attention to the Land Use Adjacency Guidelines (Section 1.4.3) in terms of land use, drainage, toxic substances in runoff, lighting, noise, invasive plant species and brush management requirements for the portions of the proposed development that would lie adjacent to

the MHPA. A description of measures proposed to reduce any identified MHPA edge effects should be included within this section as well.

The City's Biological Guidelines provides direction on development within the MHPA for projects that are located outside the Coastal Overlay Zone. Provide a discussion of the project's compliance with the regulations for development within the MHPA.

Provide a listing of all requested deviation(s)/variance(s). For each requested deviation or variance, provide analysis on whether the requested action would then result in a physical impact on the environment.

Provide a discussion/analysis on the surrounding community and whether the project would be compatible with and integrate with the existing community.

Provide a discussion/analysis on the project's compatibility with an adopted ALUCP. If the project boundary is outside the coverage area of an ALUCP, provide a brief description of the project's proximity to the closest ALUCP.

#### Traffic/Circulation/Parking

- Issue 1: Would the proposed project result in an increase in project traffic which is substantial in relation to the existing traffic load and capacity of the street system?**
- Issue 2: Would the project result in traffic generation in excess of specific community plan allocations?**
- Issue 3: Would the proposed project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange or ramp?**
- Issue 4: Would the proposed project increase the demand for off-site parking?**
- Issue 5: Would the proposed project increase traffic hazards for motor vehicles, bicyclists or pedestrians due to a proposed, non-standard, design feature (e.g. poor sight distance or driveway onto an access-restricted roadway)?**
- Issue 6: Does the proposed project conflict with adopted policies, plans or programs supporting alternative transportation models (e.g. bus turnouts, bicycle racks)?**

A traffic study would be required to analyze and estimate the expected trips the proposed project would create at build-out and document any impacts on intersections, roadways, and freeways. The traffic report would form the basis of the impact analysis for this section of the Draft EIR. The study shall evaluate the traffic volumes and levels of service on circulation element roadways. The traffic study and EIR shall include descriptions and applicable graphics of the conditions during the near term and at project build-out. The cumulative analysis shall incorporate any past, present and reasonably foreseeable future developments in the community that may impact or contribute to local and regional street and circulation systems. This

would include the concurrent efforts within Subarea A of the Grantville Redevelopment Project Area to analyze and implement alternative land uses. This section of the Draft EIR shall also describe any required modifications and/or improvements to the existing circulation system, including City streets, intersections, freeways, and interchanges. If the project would result in the construction of a roadway which is inconsistent with the General Plan and/or community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways. Provide a discussion to the extent this may be triggered.

If the project would result in a significant increase in trips, the study and EIR shall describe what measures would be required to mitigate significant traffic circulation impacts. The section shall describe the adequacy of the parking provided and the walkability, pedestrian, and bicycle connectivity within the project and off-site areas.

#### Air Quality/Global Warming

- Issue 1: Would the proposed project conflict with or obstruct the implementation of the applicable air quality plan?**
- Issue 2: Would the proposed project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?**
- Issue 3: Would project implementation result in the exposure of sensitive receptors to substantial pollutant concentrations?**
- Issue 4: Would the project exceed 100 pounds per day of Particulate Matter (PM)?**
- Issue 5: Would the proposed project be subject to or create significant adverse effect related to global warming?**

The EIR shall describe the region's climate and the San Diego Air Basin's current attainment levels for state and federal ambient air quality standards. An air quality analysis shall be prepared and included in the appendix to the EIR. The analysis shall encompass all of Subarea B and should focus on specific development proposals and assume a maximum density build-out of the remaining areas of Subarea B that are not currently being proposed for development at this time.

The air quality analysis shall focus on the project's potential air quality impacts and how this would hinder or help the San Diego Air Basin meet the regional air quality strategies. The discussion shall include potential impacts that would occur during the demolition and construction phases of the specific projects that are being proposed at this time, and the operational impacts of Subarea B, assuming maximum build-out.

A discussion of the project's consistency with the California Air Resources Board Air Quality and Land Use Handbook shall also be included. An analysis of potential stationary and non-stationary air emission sources related to the construction and operation associated with the proposed project and vehicle emission sources should be provided.

The section shall also include a discussion of any short-term, long-term and cumulative impacts the project may have on regional air quality, including construction and transportation-related sources of air pollution.

San Diego is non-attainment for PM10. Construction grading and demolition dust accounts for 30% of PM emission in the San Diego Air Basin. The South Coast Air Quality Management District's *CEQA Air Quality Handbook (1993)* estimate of emission from site grading is 26.4 pounds per graded acre; roughly 100 pounds of PM is generated by grading 4.0 acres per day. Discuss and provide appropriate analysis to determine whether the project would comply with the threshold.

The EIR shall address the project's impacts on global warming. The Air Quality section shall present an introductory overview of global climate change including the most recent information regarding the causes of global climate change, including but not limited to, greenhouse gas emissions.

The discussion shall also include current conditions and trends, and the broad environmental issues related to global climate change. A discussion of current international and domestic legislation, plans, policies, and programs pertinent to global climate change shall also be included.

An estimate of the project-generated emissions of carbon dioxide, methane, and nitrous oxide shall be provided in this section, as these are the primary non-flourinated greenhouse gases of interest. The projected greenhouse gas emissions with and without the proposed project shall be compared and lead to a qualitative discussion of the significance of the emissions relative to global climate change. The discussion should not only focus in vehicle miles traveled, but also emissions resulting from energy usage.

This section shall also include a discussion of any project features, designs or measures that would be incorporated into the project either in the development phase or during the operational phase of the project that may reduce greenhouse gas emissions.

### Hydrology

**Issue 1: Would the proposed project result in an increase in impervious surfaces and associated runoff?**

**Issue 2: Would the proposed project result in a substantial alteration to on and off-site drainage patterns due to changes in runoff flow rates or volumes?**

A portion of this project site has been identified as being within the floodway of a Special Flood Hazard Area (San Diego panel 1638) as identified by the Federal Emergency Management Agency (FEMA). Discuss whether project build-out would result in any increase to the base flood elevation. Provide a discussion and analysis focusing on the project's impact on the floodway and the floodplain. Discuss the project's proposal to change the flow of the river and any associated impacts the change may result in.

Increases in impervious surfaces could potentially result in significant erosion and subsequent sedimentation downstream. A hydrology study is required to address these issues. The study shall pay particular attention to addressing anticipated changes to existing drainage patterns and runoff volumes affecting the San Diego River and adjacent properties.

This section should also overlap with the Biology section in terms of affects the project may have on wetlands. The Hydrology section should include changes in impervious surfaces and the resulting changes in drainage patterns and their affect on exiting wetlands. A project would generally have a significant impact on biological resources if the project would result in degradation in the function and value of habitat or if the project would alter the habitat type. The Hydrology section doesn't need to include biological mitigation measures, but does need to analyze the linkage between drainage patterns and existing wetlands.

This section should include a brief discussion with respect to the subsurface water sources. Is the subsurface groundwater of any benefit? Projects which would create over 1.0 acres of impermeable hardscape in areas utilizing well water and projects which would install groundwater extraction wells may result in significant impacts.

#### Water Quality

- Issue 1: Would the proposal result in an increase in impervious surfaces or a substantial alteration of on and offsite drainage patterns affecting the rate and volume of surface runoff?**
- Issue 2: Would the proposal result in an increase in pollutant discharge to receiving waters during or following construction? Would the proposal discharge identified pollutants to an already impaired water body?**
- Issue 3: What short-term and long-term effects would the project have on local and regional water quality? What types of pre and post-construction Best Management Practices (BMPs) would be incorporated into the project to preclude impacts to local and regional water quality?**

A Water Quality Technical Report (WQTR) is required for project. The report along with the EIR shall discuss how the proposed project could affect water quality within the project area and downstream. This section shall also include the findings and conclusions of the report. This section shall also include examples of BMPs and outline programs that can be used during and post-construction and discuss the project's compliance with the City's Storm Water Standards.

#### Biological Resources

- Issue 1: Would the proposed project result in substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Services (USFWS)?**

- Issue 2:** Would the project result in a substantial impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Code or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS?
- Issue 3:** A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?
- Issue 4:** Would the proposed project interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?
- Issue 5:** Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding area?
- Issue 6:** Would the project result in adverse edge effects to the MHPA?
- Issue 7:** Would the project conflict with any local policies or ordinances protecting biological resources?
- Issue 8:** Would the project result in the introduction of invasive species of plants into a natural open space area?
- Issue 9:** Would the project result in discharging into receiving waters with Environmentally Sensitive Lands or water bodies listed on the Regional Water Quality Control Board 303 (d) Impaired Water Body List and result in the potential for a significant impact to biological resources. The biological report and the environmental document should discuss the BMPs to be implemented in order to preclude impacts to biological resources.

The project site is located wholly within the City of San Diego Multiple Species Conservation Program (MSCP) and is partially located within the MSCP's Multi-Habitat Planning Area (MHPA). Additionally, the project is located within a designated Regional Wildlife Corridor (San Diego River) within the MHPA and supports sensitive biological resources. Various sensitive upland habitat and wetlands could be potentially directly affected or indirectly affected by the project.

A Biological Technical Report is required for the project. The report shall focus on direct, indirect and cumulative impacts resulting from specific project approvals. That is, the report shall describe all of Subarea B, but should limit the impact analysis to current project proposals. The report shall be prepared in accordance with the City's Biological Resources Guidelines (July 2002). The analysis within the report shall include the entire development footprint. In addition to the analysis for

structures, roads, etc., the report shall also include any associated improvements and staging areas for construction equipment. Essentially, this section shall analyze all physical changes that may impact sensitive biological resources resulting from project implementation.

This section of the Draft EIR and the biological report must identify any MSCP covered species and narrow endemic flora and fauna that exist or have a potential to exist in the area of the proposed development. The direct, indirect, and cumulative impacts to wetland habitat shall be addressed within this section of the EIR. The wetland habitat types shall be graphically delineated, including an adequate buffer to sustain their functionality. If impacts to any wetlands or their buffers are identified, a discussion of the infeasibility of avoiding such impacts with the project shall be included. Both the biological report and the biological resources section of the EIR shall provide a detailed discussion and mapping of the MHPA and shall address potential adjacency impacts from the proposed project and any proposed mitigation measures.

#### Historical Resources (Archaeology)

**Issue 1: How would the proposed project affect historic and prehistoric resources in the Area of Potential Effect (APE)?**

**Issue 2: Would the proposed project result in any adverse physical or aesthetic effects to an architecturally significant building, structure, or object?**

**Issue 3: Would the project result in the disturbance on any human remains, including those interred outside of formal cemeteries?**

An archaeological survey is required for the proposed project. The report should include the results of the initial archaeological site survey and literature review. Provide appropriate graphics, including a map of the Area of Potential Affect (APE). Complete additional field surveys, as appropriate, to address the potential direct, indirect, and cumulative impacts of all project components.

Any newly discovered sites should be recorded at the South Coastal Information Center at San Diego State University. For sites that are expected to be impacted with project implementation, a testing program should be conducted to determine site significance in accordance with CEQA and the City's criteria pursuant to the Historical Resources Regulations and Guidelines.

The EIR should discuss the results of the archaeological survey that was prepared for the project. Would grading for the project potentially impact archaeological resources? Additionally, the Grantville Redevelopment EIR requires archaeological monitoring for any ground disturbing activities that take place in close proximity to the river.

Include the report as an appendix and provide the records search results under separate cover as a confidential appendix. The EIR should summarize the results of the report and discuss the need for a research design and a data recovery program to mitigate impacts to sites that are determined to be significant and that would be directly impacted with project implementation.

Structures that are 45 years in age or older are considered potentially significant historical resources under CEQA. In accordance with the City's Historical Guidelines, this section of the Draft EIR should include a discussion as to the potential historical significance of any structures with the project area that meet the criteria of being 45 years in age or older. If any structures are considered significant pursuant to CEQA, the EIR shall include appropriate mitigation measures to mitigate any impacts to below a level of significance.

### Noise

- Issue 1: Would the project result in or create a significant increase in the existing ambient noise levels?**
- Issue 2: Would the project result in the exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?**
- Issue 3: Would the project result in the exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan or an adopted Airport Land Use Compatibility Plan (ALUCP)?**

An acoustical analysis, prepared in accordance with the City's Acoustical Report Guidelines, is required to determine if any proposed exterior usable open space (e.g. balconies, outdoor recreational areas, etc.) would be affected by any potential noise sources (traffic, aircraft, mining operation, etc.). The technical report should also discuss any potential for the generation of noise that may affect sensitive biological resources or adjacent properties. If significant noise impacts are identified, the report shall include mitigation measures that would mitigate the impacts to below a level of significance.

The analysis in this section of the EIR shall summarize the findings of the acoustical analysis and also provide a discussion on typical sources of noise, measurements of noise, etc., to provide context for the findings of the acoustical analysis. The EIR shall further discuss potential exterior and interior noise impacts as a result of the proposed land uses and estimated traffic volumes on adjacent streets. This section shall also include an analysis of the continued mining operation and the potential noise impacts that the operation may have on the proposed project.

### Public Utilities

- Issue 1: Would the project result in the need for a new system or result in a substantial alteration to existing utilities, the construction of which would create physical impacts (e.g. natural gas, water, sewer lines, communication systems, solid waste disposal)?**
- Issue 2: Would the project result in the use of excessive amounts of fuel or energy (e.g. natural gas)?**
- Issue 3: Would the project result in the use of an excessive amount of power?**

**Issue 4: Would the project result in the use of an excessive amount of water?**

The proposed project would increase the demand on essential public services (electrical, natural gas, solar energy, communication systems, solid waste generation/disposal, water and sewer, water and sewer, and recycled water reuse) and may require new or expanded infrastructure. This section of the EIR should analyze the demand and supply relationships of various public utilities and discuss how the project would comply with local, state and federal regulations for each public utility.

Specifically, the EIR should include a Waste Management Plan that must be approved by the City's Environmental Services Department that would address Solid Waste disposal impacts. The EIR shall discuss how this project would contribute cumulatively to the region's solid waste facility capacity and summarize the findings of the Waste Management Plan.

Senate Bills 610 and 221 require a Water Supply Assessment (WSA) for projects that would require an equivalent amount of water for 500 dwelling units. The project meets this threshold and would therefore require a WSA. A WSA shall be prepared for all of Subarea B.

Landform Alteration/Visual Quality/Neighborhood Character

**Issue 1: Would the proposed project affect the visual quality of the area, particularly with respect to views from public viewing areas, vistas, or open spaces as identified in the community plan?**

**Issue 2: Would the project's bulk, scale, materials or style be incompatible with the surrounding development?**

**Issue 3: Would the proposed project cause a substantial alteration to the existing or planned character of the area, the loss of any distinctive of landmark tree(s), or stand of mature trees as identified in the Navajo Community Plan or the Tierrasanta Community Plan?**

**Issue 4: Would the project create a substantial change in the existing landform?**

**Issue 5: Would the proposed project create a substantial amount of light or glare that would adversely affect daytime or nighttime views?**

The EIR shall include an analysis of potential impacts to the community character as a result of the proposed development. As proposed, the project would include a substantial amount of grading which would exceed the City's thresholds for landform alteration. As such, the current proposal would result in a significant impact with respect to landform alteration.

Include a discussion analyzing whether any designated views to open space would be impacted. Relevant graphics and photo simulations should be included as appropriate. Identify designated views in close proximity to the proposed site. Would the project impact any designated view corridors? The Tierrasanta Community Plan

specifies the following directive with respect to views and grading, “Development adjacent to Mission Trails Park should result in minimal grading; there should be ample public view of and access to the park.” Discuss the project’s compliance with this directive.

Due to the pending visual conditions with the project, a visual simulation and analysis should be included in the DEIR. During preparation of this simulation/analysis, EAS suggests that the applicant incorporate sensitive grading techniques which allow for manufactured slopes to blend in with natural slopes on-site, by imitating the existing landforms, contouring slope faces, and contouring the tops and toes of all slopes edges. Overall, the analysis should place an emphasis on how project grading in its final form will appear to viewers from adjacent streets and from public viewing areas from various vantage points within and around Subarea B. This can be accomplished by visual simulations from various key viewing points.

Also, include a discussion of the location and size of any retaining walls. A visual impact may occur if retaining walls or noise walls greater than six feet in height and 50 feet in length with minimal landscaping screening or berming are proposed and where the walls would be visible to public. Provide discussion and any relevant graphics or photo simulations that analyze the number, size and location of any proposed retaining walls.

The Draft EIR should include an evaluation of the impacts on the natural landforms within the project boundary due to the proposed grading and include the grading quantities (cut and fill) as well as the height of proposed manufactured slopes. In accordance with the City of San Diego’s Significance Determination Thresholds, the proposed project may potentially create significant visual impacts in relation to landform alterations. The guidelines include the following in determining landform visual impact: Alteration of more than 2,000 cubic-yards of earth per graded acre; creating manufactured slopes higher than ten feet or steeper than 2:1 (50 percent); or changing the elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to a proposed grade of more than 5 feet by either excavation or fill.

It appear that the proposed project grading would exceed the landform alteration thresholds. These grading features would result in a significant landform alteration. The EIR shall identify this grading proposal as significant and unmitigable.

Discuss the amount of disturbance into steep hillsides [Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division1)]. Would the project result in the creation of manufactured slopes higher than ten feet or steeper than a 2:1 slope? Is there a change in elevation from the existing slopes to the proposed slopes? If so, is it greater than 5 feet? Discuss whether the proposed grading would mimic the existing landforms. Would the end result be substantially different that the existing topography?

Key areas to be evaluated should include grading within 25 percent or steeper slopes and areas of extensive grading (excessive artificial slope heights, filling of canyons, etc). The evaluation should identify and quantify encroachments into natural slopes with gradients greater than 25%.

A description of all proposed structures should also be included within this section of the EIR in terms of their building mass, bulk, height and architectural style.

This section shall also include an analysis with respect to lighting and glare. The analysis shall focus on the specific projects proposed at this time and shall focus on lighting that may be problematic to the MHPA and adjacent properties.

#### Population and Housing

- Issue 1: Would the proposed project displace a substantial number of existing housing, necessitating the construction of replacement housing elsewhere?**
- Issue 2: Would the project substantially alter the planned location, distribution, density, or growth rate of the population of an area?**
- Issue 3: Would the project include extensions of roads or other infrastructure not assumed in the community plan or adopted Capitol Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments?**

Growth inducement is a mandatory section in the Draft EIR. Analysis must include probable growth patterns as a result of project and impacts resulting from the population growth. In general, the analysis must avoid speculation and focus on probable growth patterns or projections. Conclusions must also be presented that determines whether this impact is significant and/or unavoidable, and provide for mitigation or avoidance.

#### Geology/Soils

- Issue 1: Would the proposed project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project?**
- Issue 2: Would the proposed project result in a substantial increase in wind or water erosion of soils, either on or off the site?**
- Issue 3: Would the proposed project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?**

The project site is located in a seismically active region of California where the potential for geologic hazards, such as earthquakes and ground failures exist. According to the City of San Diego Seismic Safety Study, the project site is located within Geologic Hazard Category 53, which is characterized as “Other Terrain” level or sloping terrain, unfavorable geologic structure, low to moderate risk. A Geologic Investigation is required for the proposed project and the EIR should include a discussion of the information, conclusions and any mitigation measures, if required.

Describe the geologic and subsurface conditions in the project area. Describe the general setting in terms of existing topography, geology (surface and subsurface), tectonics and soil types. Assess possible impacts to the project from geologic hazards and unfavorable soil conditions. The constraints discussion should include issues such as the potential for liquefaction, slope instability, and rock-fall hazards. Any

need for blasting should also be identified, if such measures are anticipated. Any secondary impacts due to soils/geology mitigation (e.g., excavation of unsuitable soil) should also be addressed. Provide mitigation, as appropriate, that would reduce the potential for future adverse impacts resulting from on-site soils and geologic hazards.

Implementation of the project would require substantial amounts of grading. Discuss in detail the type and amount of grading that would be required for this project and any potential impacts that may result from grading activities, including impacts related to removing soils from the site for off-site storage, use, and/or disposal.

#### Public Services and Facilities

**Issue 1: Would the project have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, fire/life safety protection, libraries, parks or other recreational facilities, maintenance of public facilities including roads and schools?**

The EIR shall identify the number, location, and size of public facilities such as fire and police stations, public schools, libraries, parks, and other governmental services and facilities.

Discuss the project's effect on the need for public facilities such as fire and police stations, libraries and identify any park deficiencies in the planning area. Would the project provide an adequate amount of open space in terms of parks? Provide a breakdown of the acreage and provide a brief description of the layout of the park (i.e. baseball diamond, soccer field, etc.).

#### Public Health and Safety/Hazardous Materials

**Issue 1: Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?**

**Issue 2: Would the project impair implementation of, physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Issue 3: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?**

**Issue 4: Would the project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during any previous agricultural uses?**

This section of the Draft EIR shall describe the process required to permit any use of hazardous materials and any local, state or federal regulations that would govern any future commercial or industrial uses that would require the handling of hazardous materials for their business operations. The EIR shall describe any existing and recently enacted legislation to protect the public from any potential impacts from the

use of hazardous materials. Such legislation includes the Clean Air Act, the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act and the Toxic Substances Control Act.

Additionally, as part of the environmental process, steps are needed to disclose and address the safe removal, disposal, and/or remediation of hazardous materials. There are federal and state requirements that are mandated to be incorporated into a project that may have these issues.

### Mineral Resources

**Issue 1: Would the project result in the loss of availability of a significant mineral resource (e.g. sand or gravel) as identified in the Open File Report 94-04, Update of Minimal Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region, 1996, Department of Conservation, California Department of Geological Survey?**

This section of the Draft EIR should identify which Mineral Resources Zone the site is located in and a description of what types of mining takes place on the site. If an economically feasible mineral extraction operation is the site's current use, and the site is not "exhausted", a different use of the site would likely result in a significant impact on the availability of a locally important mineral recovery site.

Discuss the existing mining operation and the CUP under which it operates. Provide a brief summary of the Reclamation Plan. Provide expected timelines in terms of when existing mining operations would cease. Provide analysis of how the mining operation would be impacted by the development and what that impact would mean to the region. This analysis should be very descriptive in terms of project phasing and should focus on whether project implementation would result in the loss of important minerals for the region.

### Paleontological Resources

**Issue 1: How would the proposed project affect paleontological resources?**

This section of the Draft EIR shall provide a brief introduction to paleontological resources. Due to the amount of grading the project proposes, and using the City of San Diego's Paleontological Guidelines, discuss the potential for project grading activities to impact fossil resources and identify any proposed mitigation measures for any significant impact.

Refer to the Redevelopment EIR as this section should reference the previous analysis. The Grantville Redevelopment EIR classifies the formational materials in to high, moderate, marginal and not significant. Much of Subarea B falls within the "not significant" category; however, grading in areas of a moderate to high rating would require paleontological monitoring during grading activities.

## VI. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Section 15126.2(c), the EIR must include a discussion of any significant irreversible environmental changes which would be caused by the proposed action should it be implemented. Address the use of nonrenewable resources during the construction and life of the project. See CEQA Section 15127 for limitation on the requirements for this discussion.

## VII. GROWTH INDUCEMENT

The EIR shall address the potential for growth inducement through implementation of the proposed project. The document should discuss the ways in which the proposed project could foster economic or population growth, or construction of additional housing either directly or indirectly. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

## VIII. CUMULATIVE IMPACTS

In accordance with CEQA Section 15130, potential cumulative impacts should be discussed in a separate section of the EIR. This section should include all existing and pending development proposals, including those undergoing review with the Development Services Department. The discussion should address the potential cumulative effects related to each environmental resources area that should be discussed in the EIR as outlined above.

### **Issue 1: What are the cumulative impacts of this project when analyzed together with other approved or proposed projects within Grantville Redevelopment Area?**

The EIR should summarize the overall short-term and long-term impacts this project could have in relation to other planned and proposed projects. When this project is considered with other past, present and reasonably foreseeable probable future projects within close proximity to Subarea B, would the proposed project result in significant environmental changes that are individually limited but cumulatively considerable? This section of the EIR shall also consider the redevelopment of Subarea A to the extent that any major project proposals would cumulatively contribute to significant impacts identified with the Subarea B project. If incremental impacts do not rise to the level of cumulatively significant the Draft EIR shall make a statement to that extent.

## IX. EFFECTS FOUND NOT TO BE SIGNIFICANT

A separate section of the EIR should include a brief discussion of why certain areas were not considered to be potentially significant and were therefore not included in the EIR.

## X. ALTERNATIVES

The EIR should place major attention on reasonable alternatives which avoid or mitigate the project's significant environmental impacts. The alternatives should meet the project objectives. Therefore, a discussion of the project's objectives should be included in this section. In addition to meeting the project's objectives, the alternatives should substantially lessen one or more significant environmental effects and should be feasible.

This section should provide a meaningful evaluation, analysis, and comparison of alternatives' impacts to those of the proposed project (matrix format recommended). These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted with sufficient graphics, narrative and detail to clearly assess the relative level of impacts and feasibility. Issues to consider when assessing "feasibility" are site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries and the applicant's control over alternative sites (own, ability to purchase, etc.).

Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should be explained.

At a minimum, the following alternatives should be considered:

### No Project Alternative

The No Project Alternative should address the feasibility of retaining the site at the time of the Notice of Preparation is published, as well as 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. This analysis should assume the continued operation of existing uses on-site and any remedial activities that are required to take place (i.e. code enforcement actions, etc.). This alternative should not assume that environmental impacts would not occur, but rather analyze any impacts that may occur due to the continued use of the site. The EIR should discuss impacts resulting from the proposed project which would be avoided or at least, minimized, under this alternative.

### Reduced Density Alternative

The Reduced Density Alternative to the proposed project should consider the construction of the project at a lower number of units. This alternative should focus on the reduction in the number of units that would reduce or avoid anticipated significant land form alternations and other environmental resources areas that are anticipated to be significant. The amount of density reduction is the amount necessary to substantially reduce one or more significant impacts.

### Reduced Grading Alternative

The Reduced Grading Alternative should consider similar and/or a reduction in the number of lots than that of the original proposal, along with reducing the amount of proposed earthwork along the points of greatest potential adverse impacts. This alternative would consider a reduction in the project's developable footprint and incorporate a grading design that would conform more closely to natural land contours. This alternative would focus on the existing landform and natural features in its design to reduce the total grading on-site. The EIR should discuss any reduction of impacts as a result of this alternative especially on the issues of land use and landform alteration.

### Tierrasanta Boulevard and Santo Road Connections Alternative

The Tierrasanta Boulevard and Santo Road Connections Alternative should assume the extension of both of these roadways. This alternative would consider how the extensions would reduce any of the proposed project's traffic impacts, biological impacts (wetlands, sensitive uplands, etc.), landform alteration impacts, etc. The analysis should also focus on how the building of these two roadways would change the configuration of the site plan and any associated reduction in impacts.

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

### **Conclusion:**

If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with this division is required to determine if these other areas need to be addressed in the EIR. Should the project description be revised, an additional scope of work may be required. Furthermore, as the project design progresses and supplementary information becomes available, the EIR may need to be expanded to include additional issue areas.

Mitigation measures should be clearly identified and discussed and their effectiveness assessed in each issue section of the EIR. In addition, a monitoring and reporting program for each mitigation measure must be included. At a minimum, this program should identify: 1) the department responsible for monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. Mitigation measures and the monitoring and reporting program for each impact should also be contained (verbatim) in a separate, stand-alone document to be paper clipped to the back of the EIR. When appropriate, EAS staff will provide the applicant with specific Mitigation Monitoring and Reporting Programs to be incorporated into the Biological, Historical and Paleontological sections of the EIR.

It is important to note that timely processing of your project will be contingent in large part on your selection of a well-qualified consultant. Prior to starting work on the EIR, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work.

If a screencheck draft EIR is not submitted to EAS for review within 30 days of the date of this letter, the application processing timeline will be held in abeyance until the report has been provided.

Please submit an additional \$7,500.00 deposit to the Development Project Manager with the submittal of the draft EIR. Actual cost of the EIR work on your project will be accounted for against your deposit. Should you have any questions, please contact the environmental analyst, Marc Cass at (619) 446-5330.

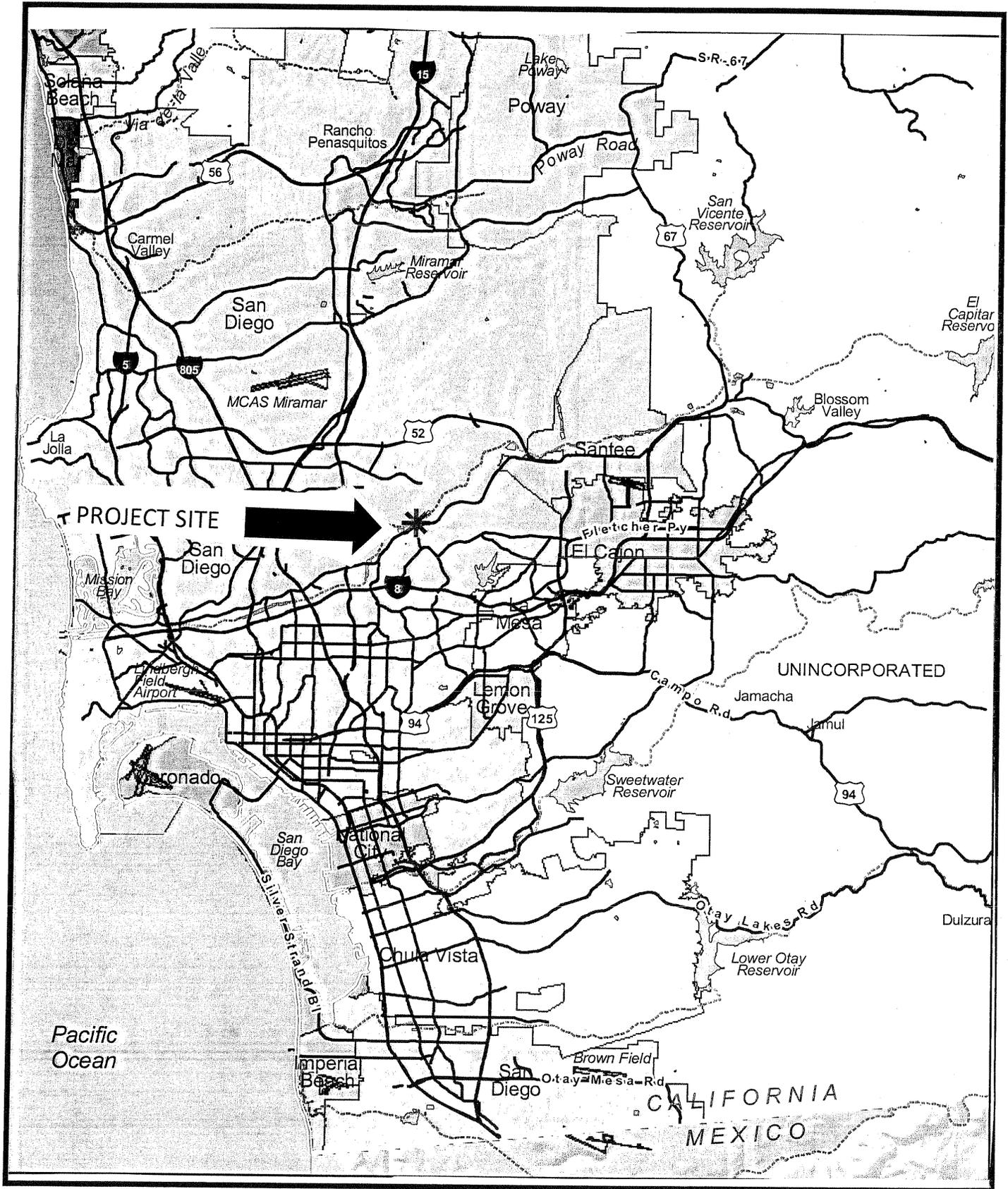
Sincerely,



Cecilia Gallardo, AICP  
Assistant Deputy Director  
Development Services Department

Enclosures: City of San Diego Technical Report and Environmental Impact Report Guidelines

cc: Jeanette Temple, Development Project Manager  
EAS Seniors, Development Services Department  
EAS File  
Julius Ocen, Entitlements-Engineering  
Jeff Oakley, Entitlements-Landscaping  
Patrick Thomas, Entitlements-Geology  
Chris Larson, Entitlements-Planning  
Isamail Elhamad, Entitlements-Transportation  
Janet King, Entitlements-Wastewater  
Mahmood Keshavarzi, Entitlements-Water Review  
Dan Monroe, Plan-Long Range Planning  
Jeanne Krosch, Plan-MSCP  
Jeff Harkness, Park and Recreation

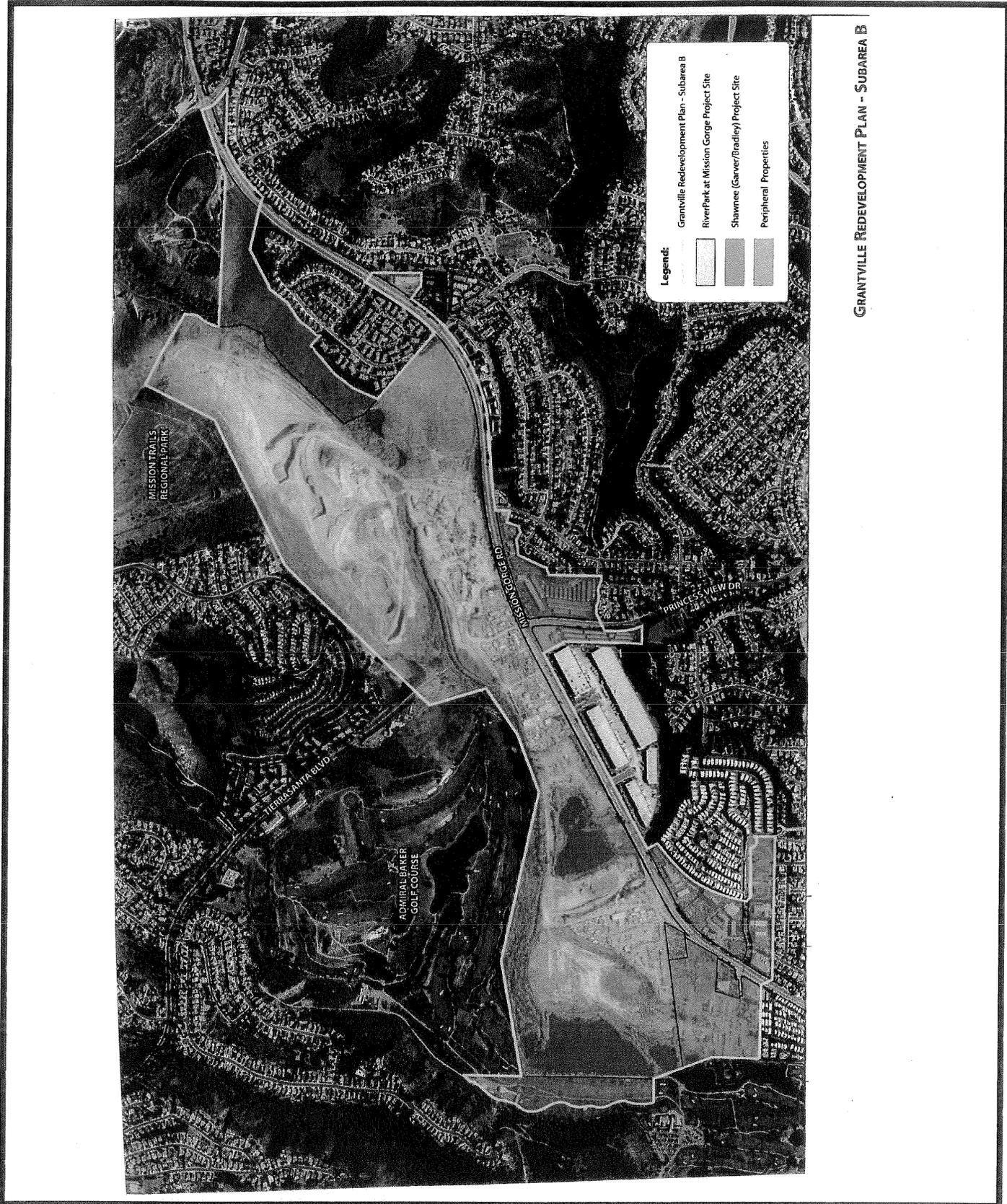


## Regional Vicinity Map

GRANTVILLE MASTER PLAN-SUBAREA B AMENDMENT:  
 RIVER PARK AT MISSION GORGE PROJECT; SHAWNEE  
 PROJECT (Project No. 146248)

City of San Diego – Development Services Department

**FIGURE**  
**No. 1**



GRANTVILLE REDEVELOPMENT PLAN - SUBAREA B

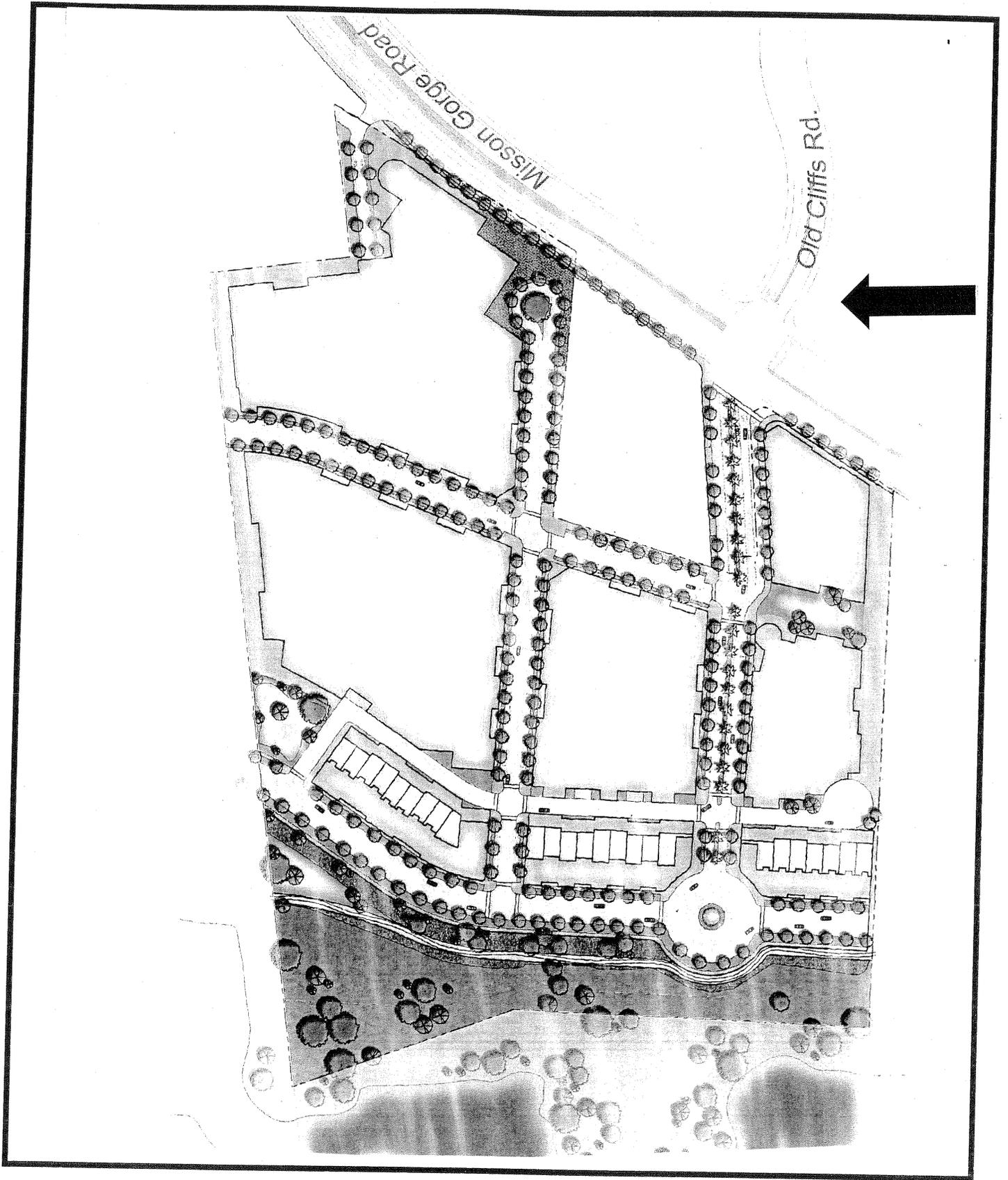


**Subarea B**

GRANTVILLE MASTER PLAN-SUBAREA B AMENDMENT:  
RIVER PARK AT MISSION GORGE PROJECT; SHAWNEE  
PROJECT (Project No. 146248)

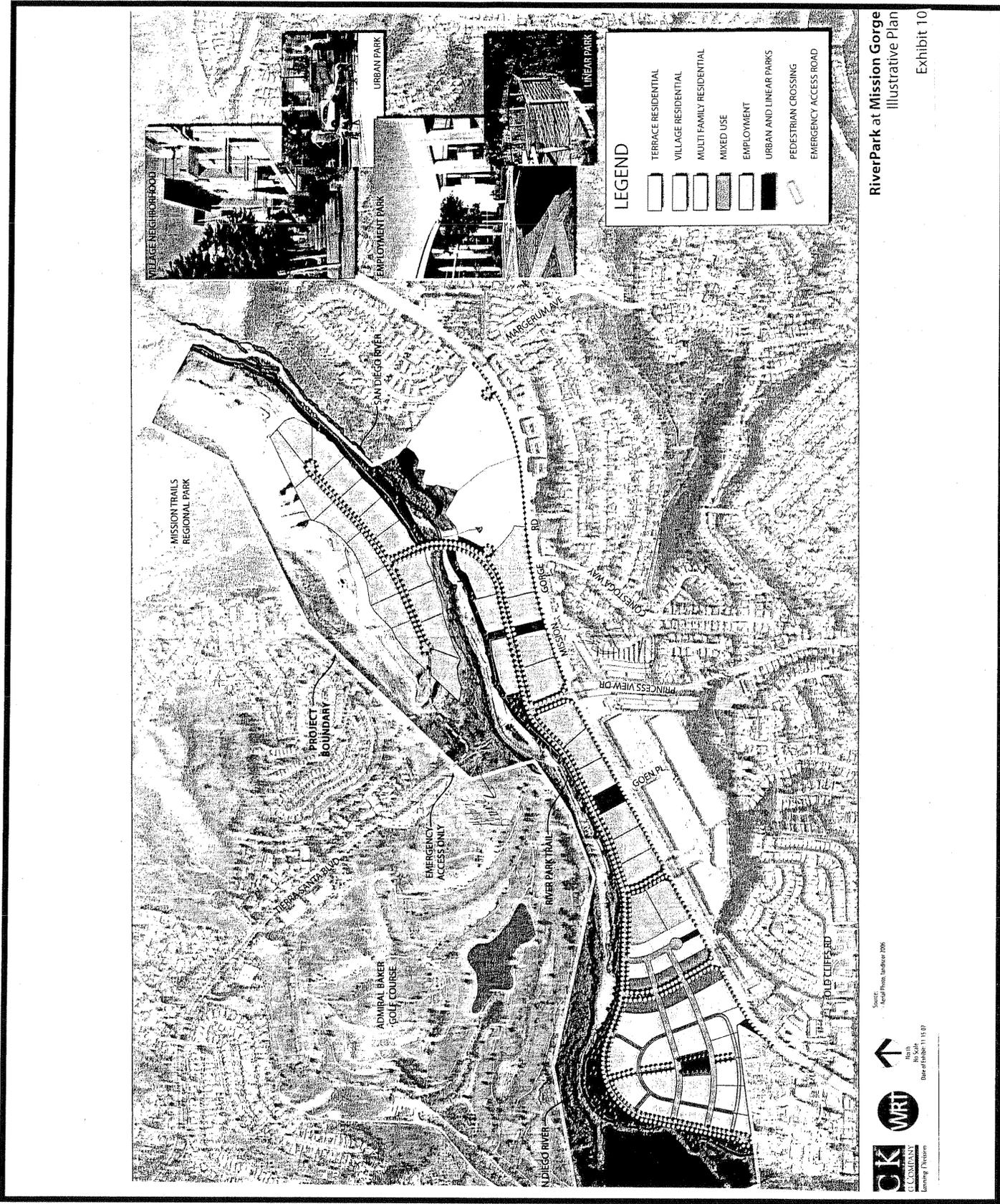
City of San Diego – Development Services Department

**FIGURE**  
**No. 2**



**Shawnee Site Plan**  
GRANTVILLE MASTER PLAN-SUBAREA B AMENDMENT:  
RIVER PARK AT MISSION GORGE PROJECT; SHAWNEE  
PROJECT (Project No. 146248)  
City of San Diego – Development Services Department

**FIGURE**  
**No. 3**



RiverPark at Mission Gorge  
 Illustrative Plan  
 Exhibit 10



**River Park at Mission Gorge Site Plan**  
 GRANTVILLE MASTER PLAN-SUBAREA B AMENDMENT:  
 RIVER PARK AT MISSION GORGE PROJECT; SHAWNEE  
 PROJECT (Project No. 146248)  
 City of San Diego – Development Services Department

**FIGURE**  
**No. 4**