THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
Date of Notice: November 5, 2013
PUBLIC NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
AND
PUBLIC NOTICE OF AN ENVIRONMENTAL IMPACT REPORT SCOPING MEETING
IO: 21003209

Public Notice: The City of San Diego Entitlements Division as the Lead Agency has determined that the project described below will require the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a project EIR and Scoping Meeting was publicly noticed and distributed on November 5, 2013. This notice was published in the San Diego Daily Transcript and placed on the City of San Diego website at the following location on November 5, 2013: **http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html**. The City is inviting your comments regarding the scope and content of the document. **Your comments must be received within 30 days of receipt of this notice/date of the Public Notice above.** Please send your written comments to the following address: **Brian Schoenfisch, Senior Planner, City of San Diego, 1222 First Avenue, MS 413, San Diego, CA 92101 or e-mail your comments to BSchoenfisch@sandiego.gov with the Internal Order No. 21003209 in the subject line.** Responsible agencies are required to indicate their statutory responsibilities in connection with this project when responding. An EIR incorporating public input will then be prepared and distributed for public review and comment.

Scoping Meeting: A scoping meeting will be held by the City of San Diego Planning, Neighborhoods, and Economic Development Department on **Tuesday, November 19th, 2013 from 6:00 to 8:00 p.m. at Mission Trails Visitor Center, 1 Father Junipero Serra Trail San Diego, CA 92119, (619) 668-3275.** The meeting could end early depending on attendance. Verbal and written comments regarding the scope and alternatives of the proposed Environmental Impact Report (EIR) will be accepted at the meeting.

General Project Information:
- Project Name/No.: Grantville Focused Plan Amendment, SCH No. Pending
- Community Plan Area: Navajo Community Planning Area
- Council District: 7

Project Description: The project location, referred to as "Subarea A," is located within the former Grantville Redevelopment Project Area, within the eastern portion of the City of San Diego, in San Diego County. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles. Subarea A is a 379-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A was formerly addressed by the Program EIR for the Grantville Redevelopment Project (March 2005, SCH #2004071122) prepared for the City of San Diego Redevelopment Agency.

The Grantville Focused Plan Amendment consists of three components: (1) a focused amendment to the Navajo Community Plan, (2) the processing of rezones, and (3) an update to the Navajo Facilities Finance Plan. The Focused Plan Amendment and rezones would introduce residential and mixed-use development to the Grantville neighborhood, currently comprised of predominately industrial and commercial uses. The proposal was developed through a series of design charrettes and several years of monthly stakeholder meetings.

Through an extensive public meeting process the Grantville Stakeholders Committee has recommended Alternative D as the CEQA project to be analyzed in the Program level Environmental Impact Report. Alternative D would result in a net increase of approximately 8,275 residential dwelling units over what would be allowed by the existing community plan. The Grantville Focused Amendment to the Navajo Community Plan will set out the long-range vision and comprehensive policy framework for how Subarea A could develop over the next 20 to 30 years. The Amendment will provide policy direction for future development and has been guided by the City of Villages growth strategy and citywide policy direction contained within the City of San Diego's General Plan (2008).

The proposed project would rezone Subarea A from predominately single-use commercial and industrial zones to multiple-use zones which promote transit-oriented development. Alternative D would be implemented through the adoption of three new zones: 1). CC-3-6, a community commercial zone which will emphasize pedestrian orientation and allow up to 44 dwelling units per acre. 2). CC-3-8, a community commercial zone which will emphasize pedestrian orientation and allow up to 73 dwelling units per acre. 3). RM-3-7, a multiple dwelling unit residential zone which will allow for limited commercial uses and allow up to 44 dwelling units per acre. The application of these zones, together with the adoption of a new Community Plan Implementation Overlay Zone (CPIOZ), will serve as the implementation tools to achieve the proposed land use amendments associated with Alternative D. The proposed CPIOZ, referred to as the "Grantville TOD CPIOZ", will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation, and allow for increased density in the area surrounding the Grantville Light Rail Trolley Station, up to 109 dwelling-units per acre, when certain criteria are met. The list of criteria will be included in the text of the Navajo Community Plan, as a focused amendment to the plan.

Applicant: The City of San Diego

Recommended Finding: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: **Land Use, Traffic/Circulation and Parking, Air Quality and Odor, Greenhouse Gas Emissions, Noise, Biological Resources, Hydrology and Water Quality, Historical Resources, Visual Effects/Neighborhood Character, Geologic Conditions, Paleontological Resources, Health and Safety, Public Services and Facilities, Public Utilities.**

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 Jeff Szymanski at (619) 446-5324. 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 the Project Manager, Brian Schoenfisch at (619) 533-6457.

Cathy Winterrowd
City of San Diego
Interim Deputy Director
Development Services Department

Attachments:

Figure 1: Regional Vicinity Map
Figure 2: Existing Land Use
Figure 3: Navajo Community Plan Land Use
Figure 4: Proposed Land Use (Alternative D)

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 & Wildlife (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)

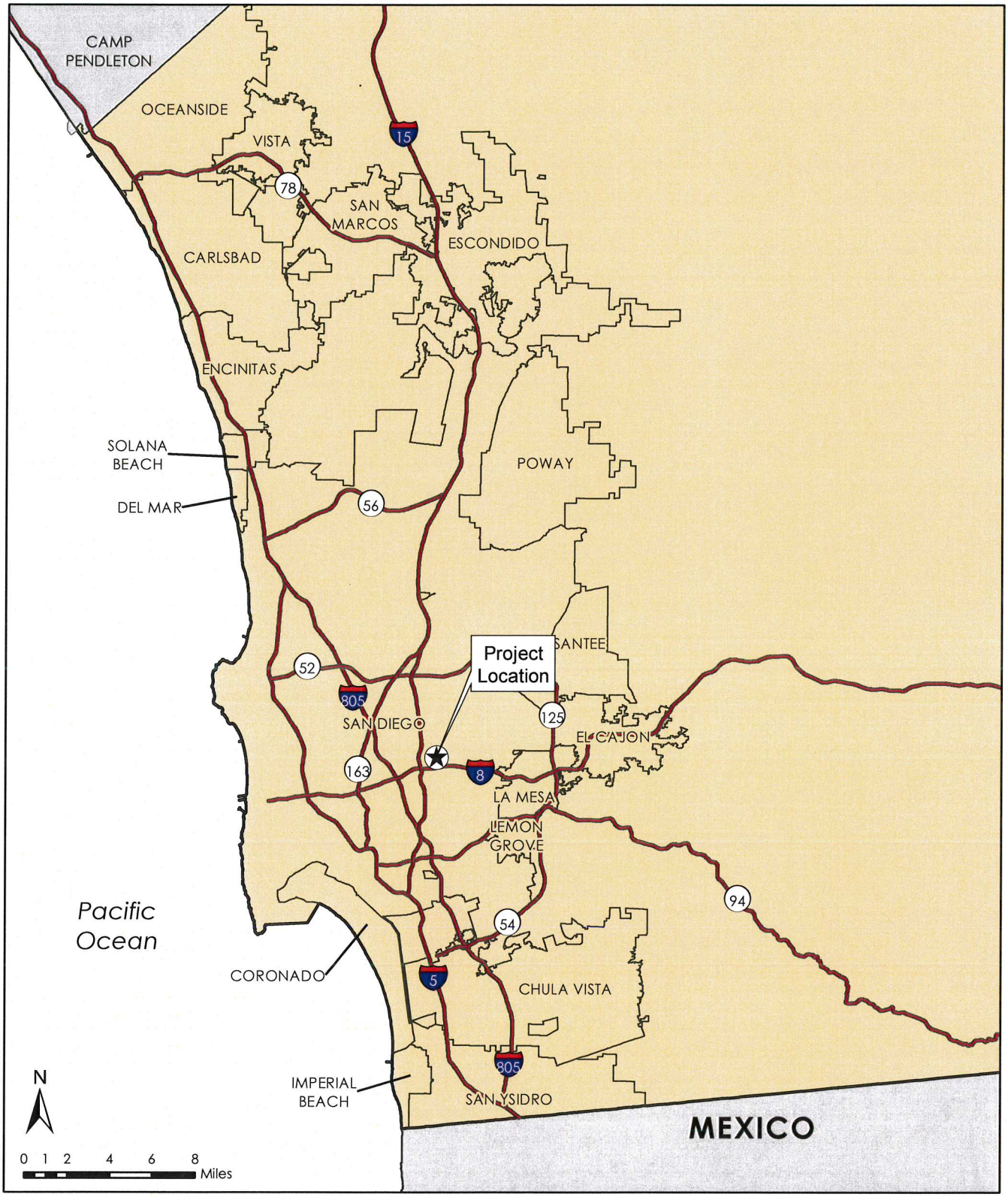
City of San Diego

Mayor's Office (91)
Council President Pro Tem Lightner, District 1
Councilmember Faulconer, District 2
Council President Gloria, District 3
Councilmember Cole, District 4
Councilmember Kersey, District 5
Councilmember Zapf, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Councilmember Emerald, District 9
City Attorney's Office (MS 59)
Park and Recreation Board (77)
Fire and Life Safety Services (79)
Library Department – Government Documents (81)
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)
Bill Fulton, Director (MS 501)
Tom Tomlinson (MS 501)
Cathy Winterrowd (MS 501)
Nancy Bragado, (MS 413)
Don Weston, Engineering (MS 501)
Gary Geiler, Planning (MS 501)
Ann Gosalves, Transportation Development (MS 501)
Mahomood Keshavarzi, Water Review (MS 401)
Jeanne Krosch, MSCP (MS 413)
Robin Shifflet, Planning (MS 413)
George Ghossain (MS 413)
Brian Schoenfisch (MS 413)

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)
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)
San Diego State University, South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Louie Guassac (215A)
Clint Linton (215B)
Frank Brown (216)
San Diego County Archaeological Society (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation (225)
Native American Distribution (225A-S)
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 (168)
San Diego River Foundation/Coalition (164)
Del Cerro Senior Social Club (339)
Mission Trails Regional Park (341)



SOURCE: SanGIS, 2013; BRG Consulting, Inc., 2013

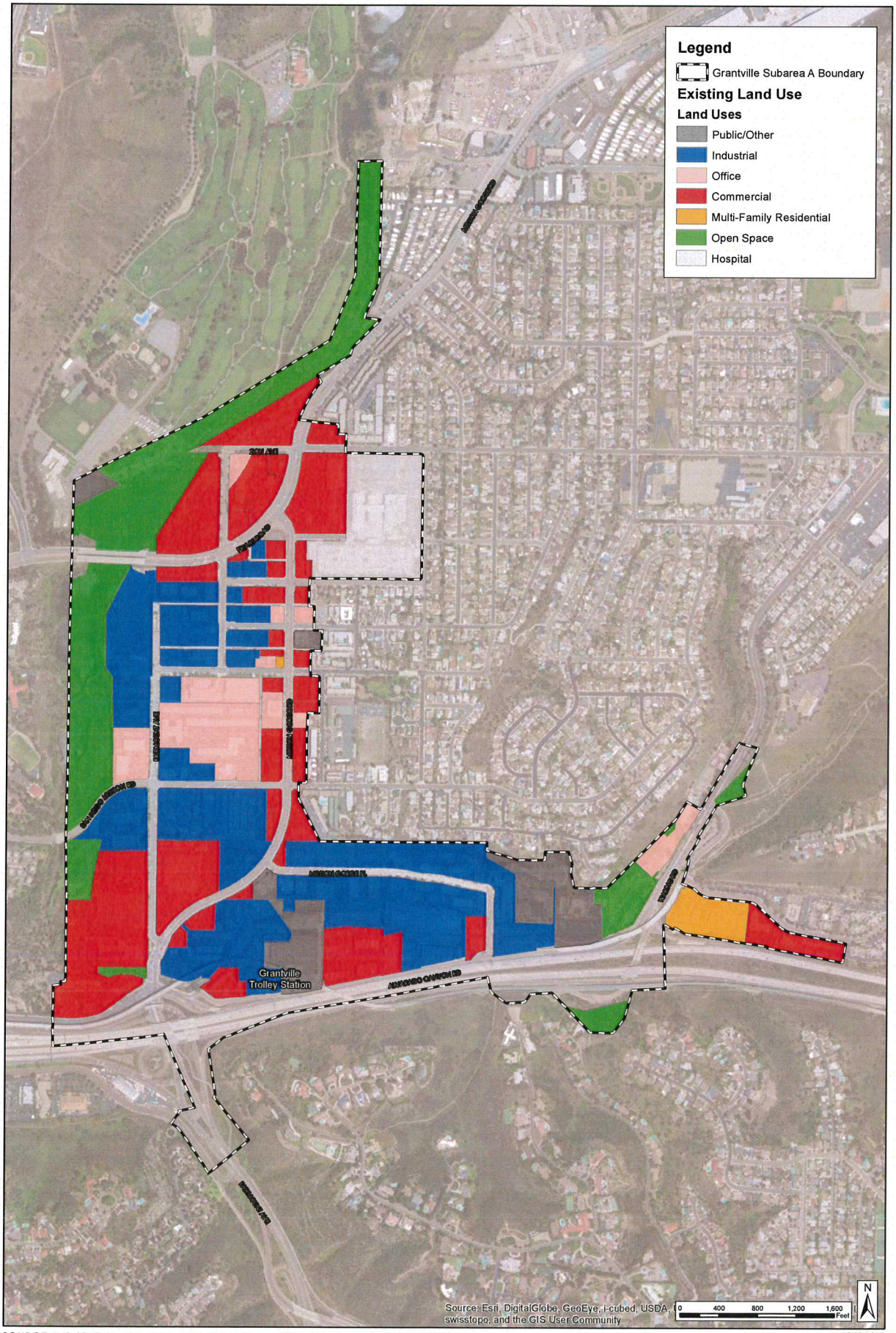
10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Regional Vicinity

FIGURE 1



SOURCE: Esri, 2013; SanGIS, 2013; City of San Diego, 2013; BRG Consulting, Inc., 2013

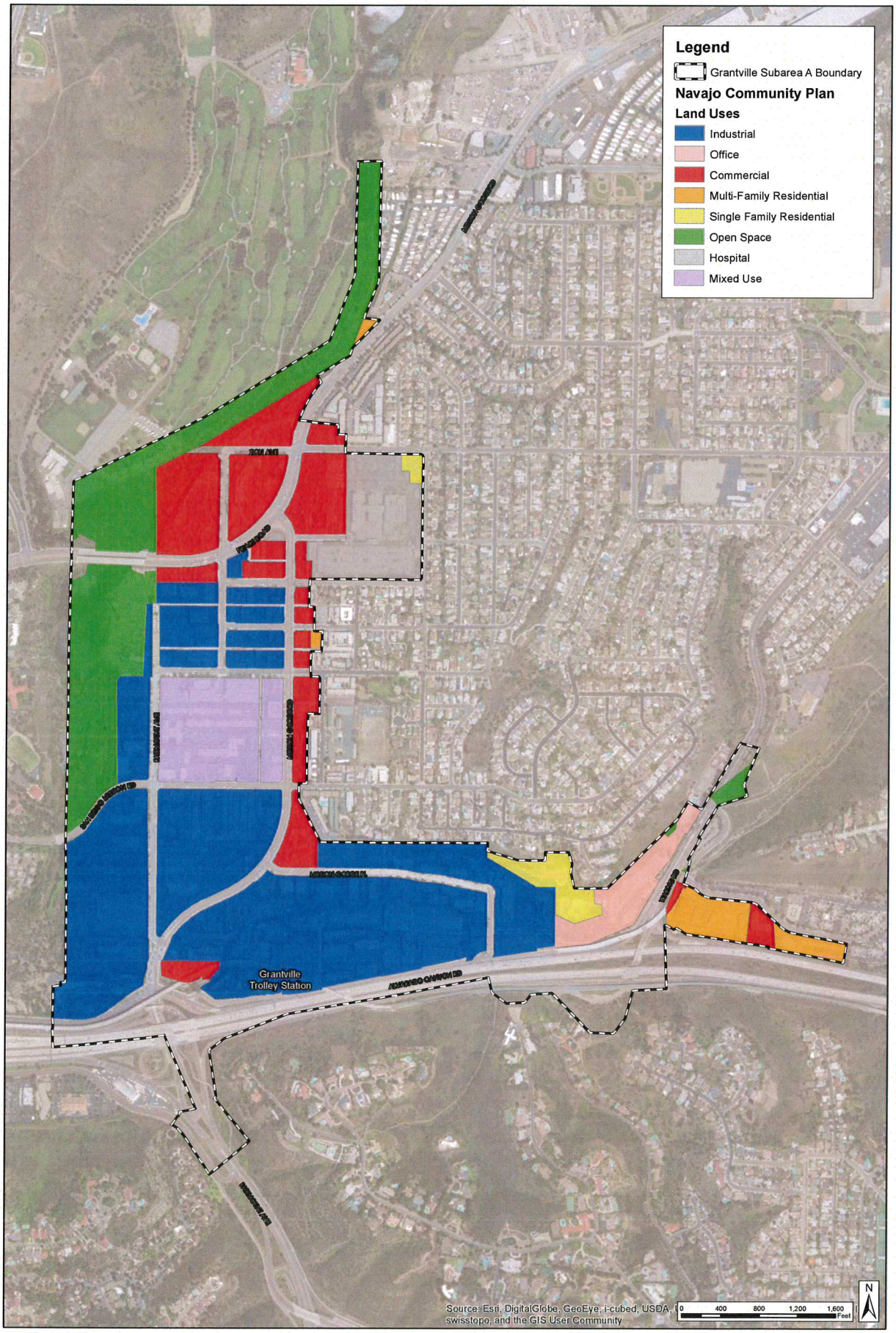
10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Existing Land Use

FIGURE 2



SOURCE: Esri, 2013; City of San Diego Navajo Community Plan, 2008

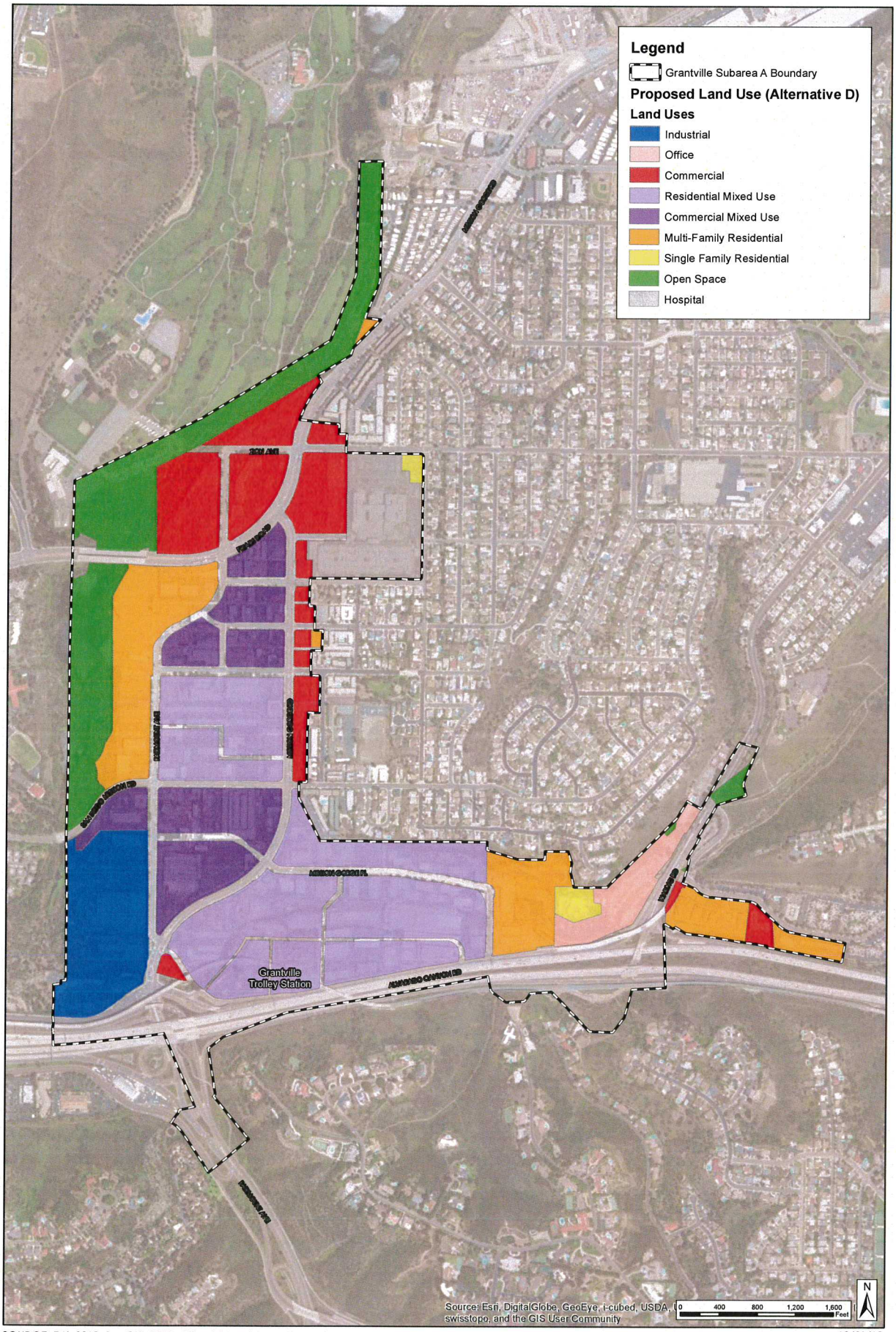
10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Planned Land Use (Navajo Community Plan)

FIGURE 3



SOURCE: Esri, 2013; SanGIS, 2013; City of San Diego, 2013; BRG Consulting, Inc., 2013

10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Proposed Land Use Plan

FIGURE 4

THE CITY OF SAN DIEGO

November 5, 2013

Brian Schoenfisch
City of San Diego
Senior Planner, Development Services Department
1222 First Avenue, MS 413
San Diego, CA 92101

SUBJECT: SCOPE OF WORK FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for the GRANTVILLE FOCUSED PLAN AMENDMENT, NAVAJO COMMUNITY PLAN (Internal Order No. 21003209) SCH No. Pending.

Dear Mr. Schoenfisch:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the Advanced Planning and Engineering Division has determined that the proposed Grantville Focused Plan Amendment may have significant effects on the environment, and preparation of an Environmental Impact Report (EIR) is required. Staff has determined that a project EIR is the appropriate document for the proposed project.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR shall be prepared in accordance with the City's "Technical Report and Environmental Impact 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) specific to the project is being distributed to Trustee and Responsible Agencies and others who may have an interest in the project.

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. A scoping meeting has been scheduled for November 19, 2013. Consequently, changes or additions to this scope of work may be required as a result of input received in response to the Scoping Meeting and Notice of Preparation. Please note, further changes to the project, prior to release of the draft EIR, may affect the need to address the issues identified in this letter.

Project Description:

The Grantville Focused Plan Amendment consists of three components: (1) a focused amendment to the Navajo Community Plan, (2) the rezoning of specific parcels, and (3) an update to the Navajo Facilities Finance Plan. The Focused Plan Amendment and rezones would introduce residential and mixed-use development to the Grantville neighborhood, currently comprised of predominately industrial and commercial uses. The proposal was developed through a series of design charrettes and several years of monthly stakeholder meetings.

The project location, referred to as "Subarea A," is located within the former Grantville Redevelopment Project Area, within the eastern portion of the City of San Diego, in San Diego County. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles. Subarea A is a 379-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A was formerly addressed by the Program EIR for the Grantville Redevelopment Project (March 2005, SCH #2004071122) prepared for the City of San Diego Redevelopment Agency.

Several project alternatives have been analyzed and through an extensive public meeting process the Grantville Stakeholders Committee has recommended the preferred alternative. The preferred alternative would result in a net increase of approximately 8,275 residential dwelling units when compared to the existing community plan. The Grantville Focused Amendment to the Navajo Community Plan will set out the long-range vision and comprehensive policy framework for how Subarea A could develop over the next 20 to 30 years. The Amendment will provide policy direction for future development and has been guided by the City of Villages growth strategy and citywide policy direction contained within the City of San Diego General Plan (2008).

The proposed project would rezone Subarea A from predominately single-use commercial and industrial zones to multiple-use zones which promote transit-oriented development. The preferred alternative would be implemented through the adoption of three new zones: 1) CC-3-6, a community commercial zone which will emphasize pedestrian orientation and allow up to 44 dwelling units per acre; 2) CC-3-8, a community commercial zone which will emphasize pedestrian orientation and allow up to 73 dwelling units per acre and 3) RM-3-7, a multiple dwelling unit residential zone which will allow for limited commercial uses and up to 44 dwelling units per acre. The application of these zones, together with the adoption of a new Community Plan Implementation Overlay Zone (CPIOZ) will serve as the implementation tools to achieve the proposed land use amendments associated with the preferred alternative. The proposed CPIOZ, referred to as the "Grantville TOD CPIOZ", will promote mixed-use, transit-oriented development with pedestrian and bicycle circulation, and allow for increased density in the area surrounding the Grantville Light Rail Trolley Station, up to 109 dwelling-units per acre, when certain criteria are met.

EIR Requirements:

The EIR serves to inform governmental agencies and the public of a project's environmental impacts. An EIR also proposes mitigation measures and alternatives that may reduce or avoid significant environmental impacts. The EIR must be written in an objective, clear and concise manner. Conclusions must be supported with qualitative information, to the extent practicable.

Each section and issue area of the EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation. The 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.

The EIR shall include a title page that includes the Project Tracking System (PTS) number and the date of publication. The EIR shall include a table of contents and an executive summary of all the following issue areas:

I. INTRODUCTION

The EIR shall introduce the project with a brief discussion on the intended use and purpose of the EIR. This discussion shall focus on the type of analysis that the EIR is providing and provide an explanation of why it is necessary to implement the proposed project. This section shall describe and/or incorporate by reference any previously certified environmental documents that cover the project site including any EIRs. This section shall briefly describe areas where the proposed project is in compliance or non-compliance with assumptions and mitigation contained in these previously certified documents. Additionally, this section will 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

The EIR shall describe the precise location of the project and present it on a detailed topographic map and regional map. This section shall also include a map of the specific proposal and discuss the existing conditions on the site. In addition, this section shall 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 jurisdictional boundaries, land use plans and overlay zones that affect the project area, such as the City of San Diego General Plan. This section shall include a brief description of the location of the closest police and fire stations along with their response times.

III. PROJECT DESCRIPTION

The EIR shall include a detailed discussion of the goals and objectives of the proposed project and a description of the proposed project. As an amendment to the Navajo Community Plan, the project description should include proposed changes to the land use plan, including land uses types and intensity, and proposed rezones within the amendment area. The EIR will also address the Public Facilities Financing Plan to the degree that any impacts associated with plan are disclosed.

IV. HISTORY OF PROJECT CHANGES

This section of the EIR shall outline the chronicle history of the project and any physical changes that have been made to the 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 City. Therefore, all impact analysis must be based on the City's current "Guidelines for the Determination of Significance." 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 shall include an explanation of the existing project site conditions, impact analysis, significance determination, and appropriate

mitigation. The impact analysis shall address potential direct and indirect impacts that could be created through implementation of the proposed project.

It is important to note that because the proposed project is comprised of a land use plan and implementing regulations (zoning), the impact analysis is programmatic in nature and not project specific. No specific development or improvement is proposed as part of the proposed project.

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 San Diego River Park Master Plan, or the Navajo Community Plan or any other applicable land use plan?

Issue 2: Would the project result in the exposure of people to noise levels that exceed the City's noise ordiance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element or the Transportation Element of the General Plan.

Issue 3: Would the proposed project result in adverse edge effects to the MHPA?

Issue 4: Would the project conflict with any local policies or ordinances protecting biological resources?

The project is located within the Navajo Community Planning Area, and portions of the project along the San Diego River to the west are located within the Multi-Habitat Planning Area (MHPA) of the Multiple Species Conservation Program (MSCP), as well as the San Diego River Park Master Plan Area. The EIR will evaluate the project's relationship with the land use policies and guidelines relative to the City's General Plan (2008), the Navajo Community Plan, the MSCP, the San Diego River Park Master Plan, as well as other relevant planning documents and applicable zoning ordinances. FEMA Special Flood Hazard Areas, also addressed in the Hydrology discussion, will be addressed here as well. In addition, this section of the EIR will address community character and the land use compatibility issues associated with the proposed project.

TRAFFIC/CIRCULATION

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 proposed 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 traffic hazards for motor

vehicles, bicyclists or pedestrians?

Issue 5: Does the proposed project conflict with adopted policies, plans or programs supporting alternative transportation models (e.g. bus turnouts, bicycle racks)?

The analysis in this section of the EIR will identify potential impacts to the traffic and circulation system. A traffic study, consistent with the City's Traffic Impact Study Manual and approved by City staff, will be prepared and included as an appendix to the EIR. A summary of the approved traffic study will be included in the body of the EIR. The summary will address the effect the proposed project would have on the existing and future surrounding circulation system. The analysis will focus on segment and intersection conditions for near term and future conditions, with or without the project. This section of the 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 significant impacts to transportation circulation, the traffic study and EIR shall describe measures that would mitigate the impacts to the extent practicable. The section also shall address the walkability, pedestrian, and bicycle connectivity within the project area and how the proposed project will affect these opportunities in the Navajo Community Plan area.

AIR QUALITY AND ODOR

Issue 1: Would the proposed project result in a conflict with or obstruct 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 the proposed project result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors)?

Issue 4: Would the proposed project expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates?

Issue 5 Would the project exceed 100 pounds per day of Particulate Matter (PM)(dust)

Issue 6: Would the proposed project create objectionable odors affecting a substantial number of people?

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 technical analysis shall discuss the proposed project's impact on the ability of the San Diego Air Basin to meet regional air quality strategies and the project's consistency

with the California Air Resources Board Air Quality and Land Use Handbook. The section and technical report shall discuss both the potential stationary and non-stationary (i.e. vehicular) air emission sources associated with construction and operation of the proposed project. The technical report and EIR section shall include estimates of total project-generated air pollutant emissions, discussion of potential dust generation during construction, evaluation of carbon monoxide hot spots, and any proposed emissions reduction design features or dust suppression measures that would avoid or lessen emissions or dust-related impacts to sensitive receptors within the area.

GREENHOUSE GAS EMISSIONS

Issue 1: Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?

Issue 2: Would the proposed project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

This section shall present an overview of greenhouse gases (GHG) including the most recent information regarding the current understanding of the mechanisms behind 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. Per General Plan direction, the EIR shall provide details of the project's sustainable features such as pedestrian access and orientation, sustainable design and building features, and other that meet criteria outlined in the Conservation Element of the General Plan.

The EIR shall address the project's contribution to greenhouse gases. A quantitative analysis addressing the project-generated greenhouse gas emissions, as applicable, shall be provided in a GHG emission study summarized in the EIR.

Based on the scope of the project, GHG emissions resulting from both construction activities related to the project and on-going operation of the project must be analyzed. The analysis should include, but is not limited to, the five primary sources of GHG emissions: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation, and water usage. If the proposed project would result in greenhouse gas emissions, project features, designs and measures should be identified and incorporated into the project to reduce GHG emissions.

As part of the cumulative impact analysis, the EIR shall analyze the project's contribution to emissions of greenhouse gases associated with vehicle trips, typical energy and water use, and other factors associated with the proposed project. The City of San Diego currently does not yet have adopted greenhouse gases (GHG) Thresholds of Significance for CEQA. Therefore, the City of San Diego is utilizing the California Air Pollution Control Officers Association (CAPCOA) report "CEQA & Climate Change," dated January 2008, as an interim threshold to determine whether a GHG analysis would be required. The CAPCOA report references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigations.

Therefore, the proposed project will be analyzed to determine whether it exceeds the 900 metric ton screening threshold. Based on this screening threshold, the proposed project may be required to complete a GHG Emission analysis in order to determine what, if any cumulative impacts would result through project implementation. An analysis of existing versus proposed emissions shall be completed. A technical report shall be prepared and will be included as an appendix to the EIR. The EIR shall summarize the results of the report, including identification of the net GHG emissions identified. In addition, the project may also be required to implement project features or mitigation to reduce the emission by 28.3 percent (consistent with the 2020 "Business-as-Usual" model from the California Air Resources Board (CARB).

NOISE

Issue 1: Would the proposed project result in or create a significant increase in the existing ambient noise levels?

A noise impact study will be prepared to analyze ambient noise levels at various public locations throughout the project area in order to characterize and document existing noise conditions. The study will estimate temporary noise levels associated with project construction activity, and model existing and future traffic noise levels along key roadways based on information from the traffic study. Projected increases in noise resulting from increased traffic will be compared to applicable significance thresholds. Noise generated by on-site activities will be estimated based on measured noise on-site and at similar facilities, then compared to City of San Diego standards to determine whether existing or proposed sensitive uses would be exposed to noise exceeding acceptable standards. The project area features land uses that may be considered sensitive receptors (e.g. hospitals, residences, daycare facilities). Additionally, portions of the project area adjacent to the San Diego River feature sensitive habitat and project related noise may impact nesting bird species (e.g., least Bell's vireo), if present. Therefore, this section will overlap with the Biology section in terms of effects the project may have on nesting birds.

BIOLOGICAL RESOURCES

Issue 1: Would the proposed project result in a 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 Wildlife (CDFW) or U.S. Fish and Wildlife Services (USFWS)?

Issue 2: Would the proposed 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 CDFW or USFWS?

Issue 3: Would the proposed project result in 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 substantially interfere with the movement of any native 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 proposed 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 region?

Issue 6: Would the proposed project result in the introduction of invasive species of plants into a natural open space area?

Issue 7: Would the proposed project result in discharging into receiving waters with Environmentally Sensitive Lands or water bodies? The biological report and the environmental document should discuss the BMPs to be implemented in order to preclude impacts to biological resources.

Portions of the project area are located within the City of San Diego Multiple Species Conservation Program's (MSCP) Multi-Habitat Planning Area (MHPA), and within a designated Regional Wildlife Corridor (San Diego River) within the MHPA. This corridor supports sensitive biological resources. This section of the EIR will address the relationship between the project site and the Regional Wildlife Corridor in context with the San Diego River.

The same portions of the project area within the MHPA also support sensitive habitat. Vegetation and sensitive wildlife directly or indirectly affected by the proposed project shall be fully discussed in this section of the EIR. A Biological Technical Report will be prepared for the project in accordance with the City of San Diego's *Biological Guidelines* (April 2012) and will be included as appendix to the EIR. This report must identify any MSCP covered and narrow endemic flora and fauna that exist or have a potential to exist in the area of the project site, and any impacts to sensitive flora and fauna, as well as discuss proposed mitigation measures for any impacts.

HYDROLOGY

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

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

Portions of the project area adjacent to the San Diego River have been identified as being within a Special Flood Hazard Area (SFHA) as identified by the Federal Emergency Management Agency (FEMA). The EIR will discuss whether project build-out would result in any increase to the base flood elevation; if so, compliance

with the Federal Insurance Administration's Technical Bulletin 3-93 will be required. The EIR will discuss and analyze the proposed project's impact on the floodway and the floodplain. If development could alter the floodway or floodplain boundaries of the Special Flood Hazard Area, future development would be required to obtain a Conditional Letter of Map Revision/Letter of Map Revision from FEMA.

The EIR shall address any potential changes in stormwater runoff (including both flowrate and volume) as a result of the proposed project. Increases in impervious surfaces could potentially result in significant erosion and subsequent sedimentation downstream. A hydrology/drainage study that is consistent with the City's Storm Water Standards will be prepared to address the proposed project's potential for impacting the hydrologic conditions within the project area and downstream, and recommend drainage design techniques to reduce runoff volumes and velocities if appropriate. Because of the programmatic nature of the project, the study will provide a preliminary analysis of the project's storm drain system(s), but will not serve as a final hydrology study to be used at final engineering and permitting.

This section will also include a brief discussion with respect to the subsurface water sources. The report will include examples of potential best management practices (BMPs) and outline programs that can be used during post-construction and discuss the project's compliance with the City's Storm Water Standards. The findings in the report and required mitigation measures shall be reflected within this section of the EIR and the report shall be included as an appendix to the EIR.

This section will overlap with the Biology section in terms of effects the project may have on wetlands. The Hydrology section will include changes in impervious surfaces and the resulting changes in drainage patterns and their effect on existing 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 proposed project would alter the habitat type. The Hydrology section will not include biological mitigation measures, but will analyze the linkage between drainage patterns and existing wetlands.

WATER QUALITY

Issue 1: Would the proposed project result in an increase in pollutant discharge, including downstream sedimentation, to receiving waters during or following construction, including discharge to an already impaired water body?

A Water Quality Technical Report (WQTR) consistent with the City's Storm Water Standards shall be prepared and included as an appendix to the EIR. Increases in impervious surfaces could potentially result in significant erosion and subsequent sedimentation downstream. Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). The change in impervious surfaces between the current and proposed land use plan should be discussed. If there is a net increase in impervious surfaces anticipated, the impervious surfaces would send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds. Therefore, the EIR and the WQTR shall discuss how the proposed project could affect water quality within the project area and downstream. The EIR section will include the findings and conclusion of the report as well as examples of BMPs and outline programs that can

be used post-construction.

HISTORICAL RESOURCES

Issue 1: Would the proposed project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or historic site?

Issue 2: Would the proposed project result in any impacts to existing religious or sacred uses or the disturbance of any human remains, including those interred outside of formal cemeteries within the potential impact area?

Issue 3: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The EIR shall discuss the project's potential for impacting historical resources. A historical resources study shall be prepared in order to identify any potential historical resources that may be located within the project area. The study will focus on the development of Grantville, including archival research, records searches, and a reconnaissance-level survey to reveal potentially historic properties and/or districts. The survey will list historic resources eligible or potentially eligible for listing in the California Register of Historical Resources, San Diego Historical Sites, and as a CEQA historic resource. Additionally, the study shall conduct an archaeological inventory of undeveloped portions of the project area, including an intensive field survey.

VISUAL EFFECTS/NEIGHBORHOOD CHARACTER

Issue 1: Would the proposed project create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Issue 2: Would the proposed project result in the creation of a negative aesthetic site or project?

Issue 3: Would the proposed project's bulk, scale, materials or style be incompatible with the surrounding development?

Issue 4: Would the proposed project cause a substantial alteration to the existing or planned character of the area?

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 the extent to which the components of the proposed project represent a significant change in the nature of the Navajo Community visual setting and context. The visual quality discussion would be closely tied to, and would reference discussions found within the Land Use section of the EIR and would discuss project consistency with the overall goals of the Navajo

Community Plan and San Diego River Park Master Plan.

GEOLOGIC CONDITIONS

Issue 1: Would the proposed project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

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 be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The project site is located in a seismically active region of California where the potential for geologic hazards such as earthquakes and ground failures exists. Therefore, a geologic technical report shall be prepared in order to assess any potential geotechnical constraints associated with the proposed project features. According to the City of San Diego Seismic Safety Study (2008 edition), the project site is located within Geologic Hazards Zones 23, 31, 32, 52, and 53. Zone 23 is characterized as a slide-prone formation with "neutral or favorable geologic structure." Zone 31 is characterized as "high potential" for liquefaction and consists of "shallow groundwater, major drainages, and hydrologic fills." Zone 32 is characterized as "low potential" for liquefaction and consists of "fluctuating groundwater with minor drainages." Zones 52 and 53 are level or sloping terrain areas with a low to moderate risk. The EIR shall be based on the geotechnical study and shall include a description of the geologic and subsurface conditions in the project area and the general setting in terms of existing topography, geology (surface and subsurface), tectonics, and soil types. The constraints discussion shall include issues such as the potential for liquefaction, slope instability, and landslides. The geologic investigation that is required for the proposed project and the EIR should include a discussion of the information, conclusions and any mitigation measures, if required.

PALEONTOLOGICAL RESOURCES

Issue 1: Would the proposed project require over 1,000 cubic yards of excavation in a high resource potential geologic formation or over 2,000 cubic yards of excavation in a moderate resource potential formation that would result in the loss of significant paleontological resources?

The geological formations underlying the project areas are considered to have a high or moderate sensitivity for paleontological resources. These formations may contain well-preserved, rare, and significant fossil materials that could provide important information about the evolutionary history of our area. There is a potential for future grading operations to impact previously undisturbed portions of these formations and impact unknown fossil deposits. The EIR shall discuss the project area's geologic composition as it relates to fossiliferous potential and include paleontological monitoring as a mitigation measure, if determined to be required.

HEALTH AND SAFETY

Issue 1: Would the proposed project expose people or structures to a significant risk of loss, injury, or death involving wildland fires?

Issue 2: Would the proposed 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 3: Would the proposed project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Issue 4: Would the proposed 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 5: Would the proposed project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

The EIR shall address the potential for hazardous materials to be present within the project area. The EIR shall also include a discussion of emergency evacuation and emergency vehicle access.

PUBLIC SERVICES AND FACILITIES

Issue 1: Would the proposed 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 or maintenance of public facilities including roads and schools?

The EIR will include discussions of potential impacts to City of San Diego public services and facilities as a result of implementation of the proposed project. The EIR will 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. The EIR also will discuss the need for adequate amounts of open space/parks, including a breakdown of the acreage and brief description of open space areas, trails, tot lots, ball courts, benches, picnic areas, etc.

PUBLIC UTILITIES

Issue 1: Would the proposed project result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (e.g. natural gas, water, sewer, communication systems, solid waste disposal)?

Issue 2: Would the proposed project result in the use of excessive amounts of

fuel or energy (e.g. natural gas), power or water?

Issue 3: Would the proposed project utilize landscape elements which are predominantly non-drought resistant vegetation?

The EIR shall include discussions of potential impacts to City of San Diego public utilities as a result of implementation of the proposed project. This section will rely on a Sewer Study for the proposed project to discuss the project's effects on the City's ability to handle sewer capabilities. This section should also discuss the project's construction and operational effects on the City's ability to handle solid waste. This section should also discuss impacts to water supplies resulting from the increased water demands for the project. This section should reference a Water Supply Assessment (WSA) that will be prepared for the proposed project.

VI. SIGNIFICANT ENVIRONEMTNAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In conformance with CEQA Section 15126.2(b) this section shall describe the significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance.

VII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In conformance with CEQA Section 15126.2(c), the EIR shall discuss the significant irreversible environmental changes, which cannot be avoided if the proposed project is implemented; and the significant irreversible changes that would result from implementation of the proposed project. This section shall also address the use of nonrenewable resources during the construction and life of the project.

VIII. GROWTH INDUCEMENT

The EIR shall address the potential for growth inducement through implementation of the proposed project. The EIR shall discuss the ways in which the proposed project could foster economic or population growth 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.

IX. CUMULATIVE IMPACTS

When the proposed project is considered with other past, present, and reasonably foreseeable projects in the project area, implementation could result in significant environmental changes, which are individually limited but cumulatively considerable (i.e., substantially contribute to global climate change due to emissions of greenhouse gases). Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts shall be discussed in a separate section of the EIR. The discussion will address the potential cumulative effects related to each environmental resources area that should be discussed in the EIR as outlined above.
The evaluation of cumulative impacts is required by State CEQA Guidelines Section 15130 to be based on either: "(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects

outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

IX. EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of San Diego, as Lead Agency, has determined that the following issue areas are not potentially significant with the proposed project and do not require analysis in this EIR: Agricultural Resources and Mineral Resources. However, if these or other potentially significant issue areas arise during the detailed environmental investigation of the proposed project, consultation with EAS staff is required to determine if these or other issue areas need to be addressed within the EIR. Additionally, as supplementary information is submitted, the EIR may need to be expanded to additional areas.

X. ALTERNATIVES

The EIR should place major attention on reasonable alternatives which avoid or mitigate the proposed 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 and jurisdictional boundaries.

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 by the Grantville Stakeholders Committee, but not analyzed in detail. The reason for rejection should be explained.

At a minimum, the following alternatives should be considered:

No Project (No Development) Alternative: The No Project Alternative shall discuss the existing conditions of the site at the time the Notice of Preparation is published. Therefore, this alternative shall consist of the maintenance of the project area in its current condition and would be equivalent to the existing setting.

Reduced Project Alternative: This alternative shall analyze a project that has a reduction in the intensity of development that would potentially reduce or avoid any traffic impacts identified for the proposed project.

If, through the environmental analysis, other alternatives become apparent which would mitigate potential impacts, these options should be discussed with EAS staff prior to including them in the 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.

XI. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP)

For each of the issue areas discussed above, mitigation measures should be clearly identified, discussed, and their effectiveness assessed in each issue section of the EIR. A Mitigation, Monitoring, and Reporting Program (MMRP) for each mitigation measure must be identified. At a minimum, the program should identify: 1) the City department or other entity responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. The separate MMRP should also be contained (verbatim) as a separate chapter within the EIR. When appropriate, EAS staff will provide the applicant with specific Mitigation Monitoring and Reporting Programs to be incorporated into the EIR.

XII. OTHER

The EIR shall include the references, individuals and agencies consulted, and certification page.

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, or if the EIR may need to be expanded to include additional issue areas.

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.

Actual cost of Staff work on the EIR will be accounted for against your deposit. Should you have any questions, please contact the Senior Planner, Jeff Szymanski at 619-446-5324.

Sincerely,

Cathy Winterrowd
Interim Deputy Director
Development Services Department

cc: Brian Schoenfisch
EAS File