



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
Date of Notice: July 12, 2013
NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
SAP#: 24001804

PUBLIC NOTICE: The City of San Diego 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 an EIR was publicly noticed and distributed on July 12, 2013 and was published in the SAN DAILY TRANSCRIPT and placed on the City of San Diego website at the following location: <http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>.

Written/Mail-in comments may be sent to Jeffrey Szymanski, City of San Diego Development Services Department, 1222 First Avenue, MS 501, San Diego, CA 92101, or e-mailed to DSDEAS@sandiego.gov referencing the Project Name (St. John Garabed Church) and Project Number (240283) in the subject line within 30 days of the posting of this notice/date of the Public Notice above. Responsible agencies are requested 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.

PROJECT NAME/PTS No.: ST. JOHN GARABED CHURCH/240283

PROJECT DESCRIPTION: A Planned Development Permit, Site Development Permit and Conditional Use Permit to develop a church campus on a 13.37-acre parcel in the North City Future Urbanizing Area, Subarea II. The project consists of the following onsite components:

- 8,740 square-foot (SF), 450-seat church
- 18,090 SF multi-purpose hall with a main assembly area of 6,200 SF to accommodate up to 500 persons in a banquet layout
- 11,010 SF Cultural and Education building with classrooms for Sunday School and religious instruction
- 13,840 SF youth recreational facility

The project also includes offsite improvements and restoration of environmentally sensitive lands within the mouth of Gonzales Canyon.

The project's surrounding land uses include undeveloped and agricultural lands to the east, north, and south, and an existing church to the west. Most of the surrounding area is open space

dedicated to agriculture and recreation. A single-family residential development is located to the south of the project site and two equestrian centers are located to the southeast. The San Dieguito River runs west, north of the project site and ends in the San Dieguito Lagoon to the west. The Del Mar Race Track/Del Mar Fairgrounds are to the northeast. The project is located at 13925 El Camino Real in the AR-1-1 Zone in the NCFUA Subarea II area, Council District 1.

Applicant: St. John Garabed Armenian Apostolic Church Trust

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, Agricultural Resources, Air Quality and Odor, Greenhouse Gas Emissions, Historical Resources, Paleontological Resources, Transportation/Circulation and Parking, Visual Effects/Neighborhood Character, Biological Resources, and Cumulative Effects.

Availability in Alternative Format: To request the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Development Services Department at (619) 446-5460 immediately to ensure availability. This information is ALSO available in alternative formats for persons with disabilities; to request this notice in alternative format, call (619) 446-5446 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Jeffrey 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 Department. For information regarding public meetings/hearings on this project, contact the Project Manager, John Fisher, at (619) 446-5231.

Cathy Winterrowd
Assistant Deputy Director
Development Services Department

DISTRIBUTION: See Attached.

ATTACHMENTS:

Figure 1: Regional Location Map
Figure 2: Vicinity map
Figure 3: Site Plan
Scoping Letter

PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

United States Government

U.S. Fish and Wildlife Service (23)

State of California

California Department of Fish and Wildlife (32A)

State Clearinghouse (46a)

City of San Diego

Council Member Lightner, District 1 (MS 10A)

Historical Resources Board (87)

City Attorney

Shannon Thomas (MS 59)

Development Services Department

Jeff Szymanski (MS 501)

Cathy Winterrowd (MS 501)

Joseph Stanco (MS 501)

Jim Quinn (MS 501)

Julius Ocean (MS 501)

Jeanne Krosch (MS 401)

Farah Mahzari (MS 501)

Craig Hooker (MS 501)

John Fisher (MS 302)

Library Dept.-Gov. Documents MS 17 (81)

Carmel Valley Branch Library (81f)

Other

Carmel Valley Community Planning Board (350)

San Dieguito River Park (116)

Sierra Club (165)

San Diego Audubon Society (167)

Jim Peugh (167A)

California Native Plant Society (170)

Endangered Habitat League (182 and 182A)

South Coastal Information Center @ San Diego State University (210)

San Diego Historical Society (211)

Frank Brown (216)

Carmen Lucas (206)

Clint Linton (215b)

San Diego Archaeological Center (212)

Save Our Heritage Organization (214)

Ron Christman (215)

Louie Guassac (215A)

San Diego County Archaeological Society (218)

Kumeyaay Cultural Heritage Preservation (223)

Kumeyaay Cultural Repatriation Committee (225)

Native American Distribution (225 A-S)

Applicant

St. John Garabed Armenian Apostolic Church Trust

Consultant

Atlantis Group



Project Site



DUDEK

68665

ST. JOHN GARABED CHURCH PROJECT NOP

FIGURE 1
Regional Map

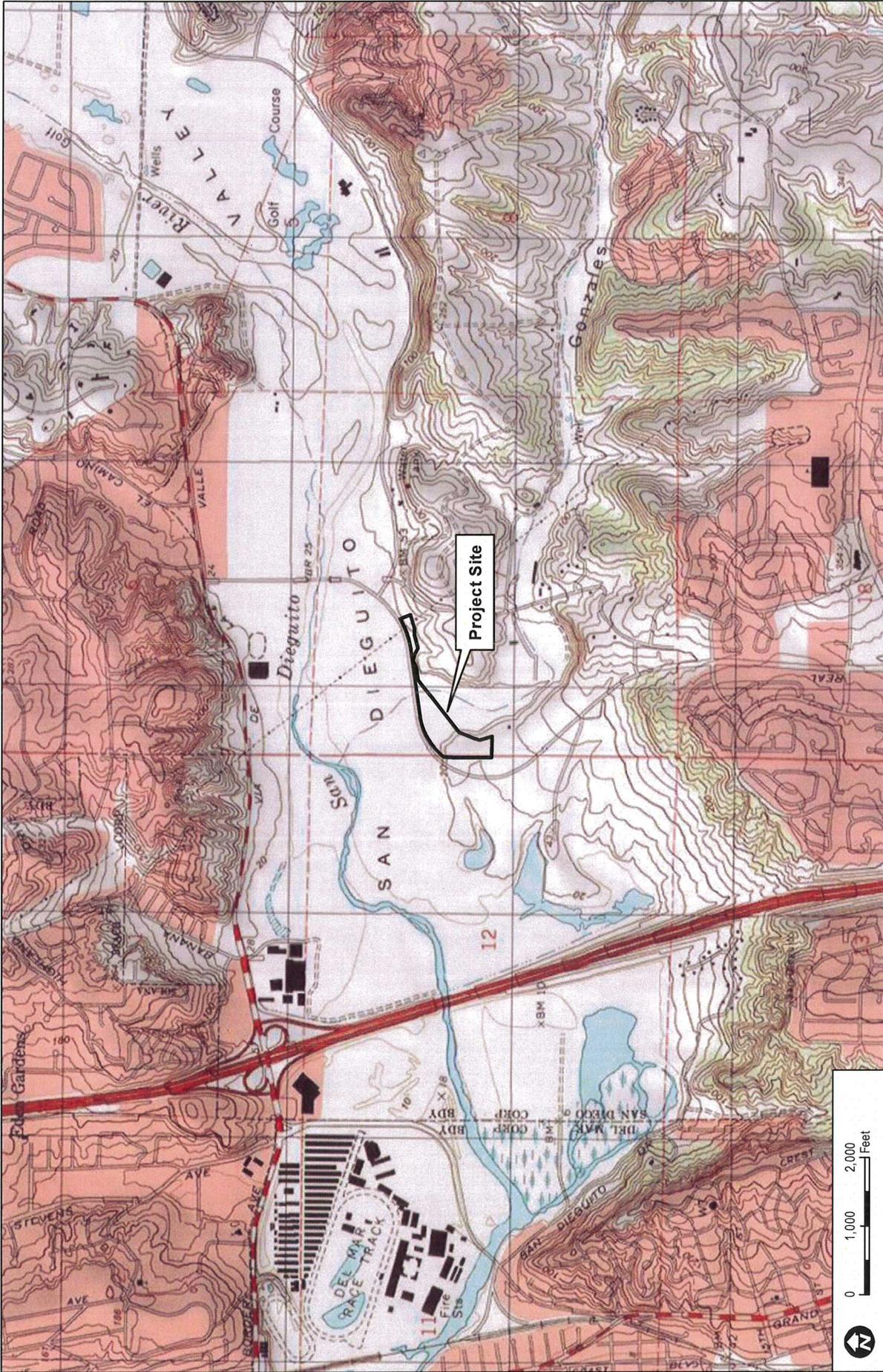


FIGURE 2
Vicinity Map

SOURCE: USGS 7.5-Minute Series Del Mar Quadrangle.

ST. JOHN GARABED CHURCH PROJECT NOP

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ST. JOHN GARABED CHURCH PROJECT NOP

FIGURE 3
Site Plan



THE CITY OF SAN DIEGO

July 12, 2013

Ms. Kathi Riser
Atlantis Group
2488 Historic Decatur Rd #200
San Diego, CA 92106

**SUBJECT: SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT REPORT
FOR THE ST. JOHN GARABED PROJECT, PROJECT NO. 240283; SAP
NO. 24001804; SUBAREA II**

Dear Ms. Riser:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City of San Diego Development Services Department has determined that the above referenced project may have significant effects on the environment. Staff has determined that an Environmental Impact Report (EIR) is the appropriate environmental document for the St. John Garabed Project.

The purpose of this letter is to identify the specific issues to be addressed in the EIR. The EIR shall be prepared in accordance with the attached "City of San Diego Technical Report and Environmental Impact Guidelines" (updated January 2011). A Notice of Preparation will be distributed to the Responsible Agencies and others who may have an interest in the project as required by CEQA Section 21083.9(a)(2) for projects that may have statewide, regional, or area-wide environmental impacts.

Each section/ issue area of the EIR shall provide a descriptive analysis of the project followed by a comprehensive evaluation. The EIR shall also include sufficient graphics and tables to provide a complete description of all major project features.

The proposed project that will be the subject of the EIR is briefly described as follows:

Project Location

The proposed project site is a 13.41-acre parcel located in the northern portion of the City of San Diego adjacent to the City of Del Mar. The site is currently undeveloped. The property is situated on the U.S. Geological Survey (USGS) 7.5 minute Del Mar quadrangle, Section 7, Township 14 South, Ranges 3 and 4 West. The project site is within the North City Future Urbanizing Area Community Plan; north of Carmel Valley and west of Fairbanks Ranch and

Pacific Highlands Ranch. The project site is situated on El Camino Real, south of Via de la Valle and north of Del Mar Heights Road, approximately 0.5 miles east of Interstate 5. The project site is zoned AR-1-1, and is located within the Coastal Overlay Zone in the original jurisdiction of the California Coastal Commission (CCC). Furthermore, a majority of the property is located within the City's Multi-Habitat Planning Area (MHPA) of the Multiple Species Conservation Program (MSCP).

Project Description

The project proposes to develop a church campus on a 13.37-acre parcel in the North City Future Urbanizing Area, Subarea II. The project consists of the following onsite components:

- 8,740 square-foot (SF), 450-seat church
- 18,090 SF multi-purpose hall with a main assembly area of 6,200 SF to accommodate up to 500 persons in a banquet layout
- 11,010 SF Cultural and Education building with classrooms for Sunday School and religious instruction
- 13,840 SF youth recreational facility

The project also includes offsite improvements and restoration of environmentally sensitive lands within the mouth of Gonzales Canyon.

The project's surrounding land uses include undeveloped and agricultural lands to the east, north, and south, and an existing church to the west. Most of the surrounding area is open space dedicated to agriculture and recreation. A single-family residential development is located to the south of the project site and two equestrian centers are located to the southeast. The San Dieguito River runs west, north of the project site and ends in the San Dieguito Lagoon to the west. The Del Mar Race Track/Del Mar Fairgrounds are to the northeast.

EIR FORMAT/CONTENT

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. Use graphics to replace extensive word descriptions and to assist in clarification. Conclusions must be supported with qualitative information, to the extent practicable.

Prior to the distribution of the draft EIR, Conclusions, which are attached at the front of the draft EIR, will also need to be prepared. The Conclusions cannot be prepared until an approved draft has been submitted and accepted by the City. The EIR shall include a title page that includes the Project Tracking System (PTS) number (240283) and the date of publication. The entire EIR

must be left justified and shall include a table of contents and an executive summary of all of the following issues areas.

A. INTRODUCTION

Introduce the project with a brief discussion on the intended use and purpose of the EIR. Describe and/or incorporate by reference the previously certified environmental documents that address the project site. Briefly describe areas where the proposed project is in compliance or non-compliance with assumptions and mitigation contained in these previously certified documents. It shall also note the history of environmental documents prepared for the site.

B. ENVIRONMENTAL SETTING

The EIR shall describe the precise location of the project and present it on a detailed topographic map and regional map. 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 site, such as the City of San Diego General Plan, North City Future Urbanizing Area.

C. PROJECT DESCRIPTION

The EIR shall include a detailed discussion of the goals and objectives of the project and a project description. Project objectives will be important factors in determining the appropriate alternatives to the project in the latter part of this document, which would reduce potentially significant impacts. The project description shall provide a discussion of all applicable discretionary actions required for the project (e.g. CUP, SDP, and PDP), as well as a discussion of all permits and approvals required by federal, state, and other regulatory agencies.

A detailed account of the development plans shall be identified within this section of the document accompanied with sufficient graphics and tables, as applicable, to provide a complete description of all project features, together with an estimated timeframe for each. This project description shall include all proposed improvements, environmental control features, operational control procedures, vehicular access points, parking and weighing areas, utility and infrastructure easements and grading quantities. Discussion shall address the whole of the proposed project.

D. HISTORY OF PROJECT CHANGES

This section of the EIR shall outline the 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 proposed project.

E. ENVIRONMENTAL ANALYSIS

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any such significant impacts. The EIR must represent the independent analysis of the City of San Diego as Lead Agency; therefore, all impact analysis must be based on the City's current "CEQA Significance Determination Thresholds." 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.

LAND USE

- Issue 1: Would the proposal require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?**
- Issue 2: Would the proposal result in a conflict with the environmental goals, objectives, or recommendations of the community plan in which it is located?**
- Issue 3: Would the proposal conflict with the provisions of the City's Multiple Species Conservation Program Subarea Plan or other approved local, regional or state habitat conservation plan?**

The project site is within the North City Future Urbanizing Area Community Plan; as defined by the City of San Diego General Plan. The project site is also within the Coastal Overlay Zone in the original jurisdiction of the California Coastal Commission (CCC). The project requires a CUP and a rezone. To determine, what land use impacts would result, a justification for a land use change will be submitted and evaluated. In addition, the potential contribution of the area to the local and regional economy will be completed and the results of this evaluation will be included in the EIR.

The EIR shall systemically identify all of the relevant goals, objectives and recommendations within applicable plans/ordinances that pertain to the project and analyze whether project implementation would be consistent with them (the discussion

may be cross-referenced to other sections of the EIR). Any deviations from the underlying zone shall be noted in the land use section.

A majority of the site does lie within City of San Diego's designated MHPA of the MSCP and will require restoration mitigation to lessen potential impacts. The Applicant will be required to create and restore disturbed habitat. However, there are no impacts anticipated to occur to Army Corps of Engineers (ACOE) or California Department of Fish and Wildlife (CDFW) wetlands or waters.

AGRICULTURAL RESOURCES

- Issue 1: Would the proposal result in the conversion of a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- Issue 2: Would the proposal conflict with existing zoning for agricultural use, or Williamson Act contract?**
- Issue 3: Would the proposal involve other changes in the existing environment which due to their location or nature, could result in conversion of Farmland, to non-agricultural use?**

The project site contains both Farmland of Local Importance and Prime Farmland. The EIR section shall discuss the potential for impacts to these agricultural resources, and provide mitigation as appropriate to reduce any impacts.

AIR QUALITY AND ODOR

- Issue 1: Would the proposal conflict with or obstruct the implementation of the applicable air quality plan?**
- Issue 2: Would the proposal result in a violation any air quality standard or contribute substantially to an existing or projected air quality violation?**
- Issue 3: Would the proposal result in the creation of objectionable odors affecting a substantial number of people?**
- Issue 4: Would the proposal exceed 100 pounds per day of particulate Matter (PM) (dust)?**
- Issue 5: Would the proposal result in substantial alteration of air movement in the area of the project?**

An air quality study shall be prepared to discuss the proposed project's impact on the ability of the San Diego Air Basin to meet regional air quality strategies. The EIR 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 section and technical report shall also include estimates of total project-generated air pollutant emissions, discussion of potential dust generation during construction, evaluation of the potential for 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 proposal generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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

A quantitative analysis addressing the project-generated greenhouse gas (GHG) emissions shall be provided in a GHG emissions analysis and summarized in the EIR. The analysis should include, but not be limited to, the primary sources of GHG emissions associated with the project: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation and water usage. The City of San Diego has not adopted a formal Thresholds of Significance for CEQA for GHG emissions. Therefore, in accordance with amendments to the state CEQA Guidelines regarding analysis of greenhouse gas emissions, 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 guideline 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 mitigation. Therefore, the proposed project will be analyzed to determine whether it exceeds the 900 metric ton screening threshold. If so, a GHG analysis 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 to reduce the emission by 28.3 percent (consistent with the 2020 "Business-As-Usual" methodology used in the California Air Resources Board [CARB] Scoping Plan).

HISTORICAL RESOURCES

- Issue 1: Would the proposal result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?**
- Issue 2: Would the proposal result in any impact to existing religious or sacred uses within the potential impact area?**
- Issue 3: Would the proposal result in the disturbance of any human remains, including those interred outside of formal cemeteries?**

The EIR shall include a cultural resources technical report to evaluate the significance of cultural resources on the project site. Cultural monitoring could be required during grading activities to ensure resource preservation. The EIR shall discuss the site's cultural resource potential and required cultural monitoring as mitigation as a part of the Mitigation Monitoring and Reporting Program (MMRP) section.

PALEONTOLOGICAL RESOURCES

- Issue 1: Would the proposal require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?**
- Issue 2: Would the proposal require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?**

The EIR shall include an evaluation of paleontological resources based on the amount of excavation required in a potential geologic deposit, geologic formation, or rock unit. Paleontological monitoring could be required during grading activities into undisturbed formation by a qualified paleontologist to ensure resource preservation. The EIR shall discuss the site's geologic composition and require paleontological monitoring as mitigation as a part of the Mitigation Monitoring and Reporting Program (MMRP) section.

TRANSPORTATION/CIRCULATION AND PARKING

- Issue 1: Would the proposal result in traffic generation in excess of specific community plan allocation?**
- Issue 2: Would the proposal result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system?**

- Issue 3: Would the proposal result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?**
- Issue 4: Would the proposal result in an increased demand for off-site parking?**
- Issue 5: Would the proposal result in effects on existing parking?**
- Issue 6: Would the proposal result in a substantial impact upon existing or planned transportation systems?**
- Issue 7: Would the proposal result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks or other open space areas?**
- Issue 8: Would the proposal result in an increase in traffic hazards for motor vehicles, bicycles or pedestrians due to a proposed, non-standard design feature (e.g. poor sight distance or driveway onto an access-restricted roadway)?**
- Issue 9: Would the proposal result in a conflict with adopted policies, plans or programs supporting alternative transportation models.**

A traffic impact study shall be prepared for the project consistent with the City's Traffic Impact Study Manual, and shall be submitted to and approved by City staff. The study will provide a basis for the impact analysis to be addressed within this section of the EIR. The study and EIR shall include descriptions and applicable graphics of the existing transportation conditions within the project area, and a comparative analysis of project conditions at phased and project build out.

This section of the EIR shall address potential impacts on traffic and circulation patterns on roadways, intersection, freeway interchanges and ramps, which could be created through implementation of the proposed project, as well as internal vehicular circulation on the property. Quantified volumes shall be provided for existing, existing plus cumulative projects, existing plus cumulative projects plus project and horizon year without and with project traffic conditions. Appropriate mitigation measures shall be provided as well as specific development thresholds at which improvement must be implemented.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

- Issue 1: Would the proposal result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?**

- Issue 2: Would the proposal result in the creation of a negative aesthetic site or project?**
- Issue 3: Would the proposal result in bulk, scale, materials, or style which would be incompatible with surrounding development?**
- Issue 4: Would the proposal result in the substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area?**
- Issue 5: Would the proposal result in the loss of any distinctive or landmark tree(s) or stand of mature trees as identified in the community plan?**
- Issue 6: Would the proposal result in the substantial change in an existing landform?**
- Issue 7: Would the proposal result in substantial light or glare which would adversely affect daytime or nighttime views in the area?**

This section of the EIR shall evaluate grading associated with the project and the potential change in the visual environment based on the proposed development. The section shall contain a visual analysis of any potential impacts to visual quality due to the proposed project. The proposed structures shall be described in terms of building mass, bulk, height, and architecture. Visual impacts of the proposed project from public vantage points shall be addressed. Visibility of the site from public vantage points should be identified through visual simulations prepared as part of the EIR.

BIOLOGICAL RESOURCES

would the project result in:

- Issue 1: 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 Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?**
- Issue 2: A substantial adverse 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 manual 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:** Interfering substantially 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:** 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:** An Introduction of a land use within an area adjacent to the MHPA that would result in adverse edge effects?
- Issue 7:** A conflict with any local policies or ordinances protecting biological resources?
- Issue 8:** An introduction of invasive species of plants into a natural open space area?

Upland vegetation and sensitive wildlife would potentially be directly and/or indirectly affected by project implementation and must be fully discussed within this section of the EIR. A biological resources report is required for the project in order to identify and quantify biological resources on-site and required mitigation.

F. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This section shall describe any significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance.

G. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

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

H. 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.

I. 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 gasses). Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts shall be discussed in a separate section of the EIR.

J. 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: Energy, Geologic Conditions, Health and Safety, Hydrology/Water Quality, Mineral Resources, Noise, Population and Housing, Public Services and Facilities, and Public Utilities. However, if these or other potentially significant issue areas arise during the detailed environmental investigation of the 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 include additional areas.

K. ALTERNATIVES

The EIR must place major attention on reasonable alternatives which avoid or reduce the project's significant environmental impacts. These alternatives shall be identified and discussed in detail, and shall address all significant impacts. The alternatives analysis shall be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. At a minimum, the following alternatives shall be considered:

No Project (No Development) Alternative: The No Project Alternative shall discuss the existing conditions at the site at the time the Notice of Preparation is published. Therefore, this alternative would assume the proposed project would not be implemented.

If, through the environmental analysis process, other alternatives become apparent which would mitigate potential impacts, these options shall be discussed with EAS staff before including them in the EIR. It is important to emphasize that the alternatives section of the EIR shall 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 alternatives analysis.

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

For each of the issue areas discussed above, mitigation measures shall be clearly identified, discussed, and the EIR effectiveness assessed in each issue section of the EIR. A Mitigation, Monitoring and Reporting Program (MMRP) for each mitigation measure must be included. At a minimum, the program shall 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 shall also be contained (verbatim) as a separate chapter within the EIR.

M. OTHER

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

Until the screencheck EIR is submitted, which addresses all of the above issues, the environmental processing timeline will be held in abeyance. Should you have any questions/and or concerns, please do not hesitate to contact me directly at (619) 446-5324.

Sincerely,



Cathy Winterrowd
Assistant Deputy Director
Development Services Department