

RESOLUTION NUMBER R- 290105

ADOPTED ON MAY 12 1998

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO CERTIFYING THAT THE COUNCIL HAS REVIEWED AND CONSIDERED INFORMATION CONTAINED IN THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SAN YSIDRO REDEVELOPMENT PROJECT, AND THE SECONDARY STUDY AND MITIGATED NEGATIVE DECLARATION WITH RESPECT TO THE PROPOSED DISPOSITION AND DEVELOPMENT AGREEMENT BETWEEN THE REDEVELOPMENT AGENCY OF THE CITY OF SAN DIEGO AND LANDGRANT DEVELOPMENT UNLIMITED, AND MAKING CERTAIN FINDINGS AND DETERMINATIONS REGARDING ENVIRONMENTAL IMPACTS OF THE DEVELOPMENT PURSUANT THERETO.

WHEREAS, the Council of The City of San Diego [Council] is engaged in activities necessary to carry out and implement the Redevelopment Plan for the San Ysidro Redevelopment Project [Project]; and

WHEREAS, the Redevelopment Agency of The City of San Diego [Agency] has previously prepared, and the Agency (Resolution No. 2641) and the Council (Resolution No. R-287149) have certified the Final Environmental Impact Report for the San Ysidro Redevelopment Project [FEIR]; and

WHEREAS, the Council proposes to approve a Disposition and Development Agreement [Agreement] between the Agency and LandGrant Development Unlimited, a California corporation [Developer], for the sale of certain property in the Project area to the Developer for the construction thereon, and on adjacent property owned or to be acquired by the Developer, of a mixed use development; and

WHEREAS, the sale of the property and the construction of the mixed use development pursuant to the provisions of the proposed Agreement between the Agency and Developer is a redevelopment implementation activity whose environmental impacts are assessed in the FEIR; and

WHEREAS, the Agency, has prepared a Secondary Study, and a Mitigated Negative Declaration, in accordance with and pursuant to the California Environmental Quality Act of 1970 [CEQA] and State and local regulations and guidelines adopted pursuant thereto, and such Secondary Study and Mitigated Negative Declaration assess the environmental impacts of the sale and development of the real property pursuant to the Agreement; and

WHEREAS, the Council has considered the environmental effects of the proposed development as shown in the FEIR and the Secondary Study and Mitigated Negative Declaration; NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, as follows:

1. That the City Council hereby certifies that the Secondary Study of environmental impacts, and Mitigated Negative Declaration, with respect to the proposed sale and development of the real property pursuant to the Agreement has been prepared and completed in compliance with the California Environmental Quality Act of 1970 and State and local regulations and guidelines adopted pursuant thereto and that the Council has certified thereto.
2. That the Council hereby further certifies that the information contained in the Secondary Study, the Mitigated Negative Declaration, and the FEIR has been reviewed and considered by the Council members.
3. That the Council hereby finds and determines that:

a. No substantial changes are proposed in the San Ysidro Redevelopment Project, or with respect to the circumstances under which the Project is to be undertaken, as a result of the sale and development of the real property pursuant to the Agreement, which will require important revisions in the FEIR for the Project, due to the involvement of new significant environmental impacts not covered in the FEIR; and

b. Except as assessed in the Mitigated Negative Declaration, no new information of substantial importance to the Project has become available which was not known or could not have been known at the time the FEIR for the Project was certified as complete, and which shows that the Project will have any significant effects not discussed previously in the FEIR, or that any significant effects previously examined will be substantially more severe than shown in the FEIR, or that any mitigation measures or alternatives previously found not to be feasible or not previously considered, would substantially reduce or lessen any significant effects of the Project on the environment; and


c. No subsequent environmental impact report, or supplement or addendum to the FEIR, is necessary or required; and

d. Based upon specific information now available with respect to the proposed Agreement, and the mixed use development thereunder, as set forth in the Secondary Study, the Agency prepared a Mitigated Negative Declaration with respect to certain potentially significant effects of the development, which will be reduced to a less than significant level, as described in Attachment A hereto; and

e. The sale and development of the real property pursuant to the Agreement will have no significant effect on the environment, except as identified and considered in the FEIR for the Project.

4. That the development specific Mitigation Monitoring and Reporting Program with respect to the Agreement, and the development thereunder, Section V Attachment A hereto, is hereby approved and adopted.

APPROVED: CASEY GWINN, City Attorney

for By 
Allisyn L. Thomas
Deputy City Attorney

ALT:lc
05/06/98
Or. Dept: Redev.
R-98-1247
Form=r&t.frm

**CITY OF SAN DIEGO, CALIFORNIA
REDEVELOPMENT AGENCY**

MITIGATED NEGATIVE DECLARATION

Pursuant to: California Environmental Quality Act (CEQA)
(California Public Resources Code, Section 21000 et seq.)

Subject: **INTERNATIONAL GATEWAY OF THE AMERICAS PROJECT**
DISPOSITION & DEVELOPMENT AGREEMENT for development of a largely vacant site for various retail (approximately 574,000 square feet), office (approximately 122,500 square feet), federal inspection (approximately 45,000 square feet), hotel/conference center (approximately 250,000 square feet) and university/cultural center (approximately 50,000 square feet) uses. Rerouting of the San Diego Trolley and other transit vehicles, as well as, improved pedestrian access to Mexico are also included as part of this project.

The proposed project is located west of the International Border Crossing in the San Ysidro Community Planning Area, City of San Diego, San Diego County, California.

Applicant: LandGrant Development, Inc. and the Redevelopment Agency of the City of San Diego.

I. PROJECT DESCRIPTION:

See attached Initial Study (also described as "Secondary Study" in the Redevelopment Agency of the City of San Diego procedures for implementation of the California Environmental Quality Act and the State CEQA Guidelines.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. FINDING:

In compliance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines, the Redevelopment Agency of the City of San Diego has conducted an Initial Study pursuant to CEQA and have determined that the proposed project will not have a significant effect on the environment, and therefore, does not require the preparation of an Environmental Impact Report.

IV. DOCUMENTATION:

The attached Initial Study, compiled in accordance with CEQA, documents the reasons to support the above findings. An Environmental Record is available for review and is on file at the Redevelopment Agency, City Administration Building, 202 C Street, 3rd Floor, M.S. 3A.

EXHIBIT A

R - 290105

V. MITIGATING MEASURES

1. Noise and Vibration

Construction

The following noise control measures shall be implemented in order to minimize noise and vibration disturbances at sensitive receptors during construction activities:

Equipment Noise Control.

- Use equipment with improved noise muffling and ensure that all equipment items have the manufacturers' recommended noise abatement measures, such as mufflers and engine covers, and that engine vibration isolators are intact and operational. Such equipment will generally be quieter in operation than older equipment. All construction equipment should be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers, shroud, etc.).
- Use hydraulic tools instead of pneumatic impact tools.
- Turn off idling equipment.
- Maximize the physical separation, to the extent feasible, between noise generators and noise receptors.

Administrative Measures

- Construction activities shall be limited to daytime hours, 7:00 a.m. to 7:00 p.m. Nighttime or late evening construction shall not be allowed near sensitive receptors. No noise-generating construction activities shall take place on Saturdays, Sundays, and holidays.
- Plan noisier operations during times of highest ambient noise levels.
- Keep noise levels relatively uniform and avoid impulsive noises.
- Coordinate high vibration generating operations with the future users of any nearby vibration sensitive instruments.
- Truck deliveries and haul-off shall only be permitted between the hours of 7:00 a.m. and 7:00 p.m. Heavy trucks shall be routed over streets that will cause the least disturbance to residences or business in the vicinity of the project site.
- Place any maintenance yard, batch plant, and other construction oriented operations in locations which would be the least disruptive to the community.
- Maintain good public relations with the community to minimize objections to the impact of unavoidable construction noise. The noise impacted communities should be notified in advance of the construction schedule.
- A combination of mitigation techniques with equipment noise control and administrative measures can be selected to provide the most effective overall noise

reduction for construction activities. Application of the mitigation measures will reduce the construction noise impacts; however, temporary increases in noise and vibration would still occur.

Operation Traffic

Construction of a 6 to 8 foot high wall along the north side of Camino de La Plaza and west of Willow Road would mitigate the cumulative traffic noise impact at the school playground.

Construction of a 6 to 8 foot high wall in front of apartments located along Camino de La Plaza and Willow Road would mitigate future traffic noise impacts. It is noted that construction of such a wall will eliminate direct access of these apartment units to the street. For a wall to be effective, it shall be continuous and designed to minimize openings. Access openings can severely reduce the noise reduction effectiveness of the wall.

Mitigation for these noise impacts are to be shared by developers in the Redevelopment Area whose projects would cumulatively contribute to significant noise impacts along Willow Road and Camino de la Plaza. LandGrant Development shall contribute to a mitigation account, to be established by the Redevelopment Agency for the necessary construction of walls to reduce noise levels to a level of insignificance. Alternatively, they may construct noise barriers along Camino de la Plaza based on their pro-rata share of impact.

Train Operations

The following mitigation measures are recommended to reduce the noise and vibration impact due to the operation of the proposed LRT:

- It is recommended to place the future hotel rooms at a minimum of 150 feet distance from the LRT track to reduce the noise impacts as well as reduce the projected ground-borne vibration effects;
- At the at-grade crossing, ceramic bells should be used and should sound only when gates are on the way down or on the way up. Bells should be silent during the stationary down phase of the gate operations;
- It is recommended that the train speed be maintained at 25 mph or less starting west of the I-5 over crossing. Reducing the train speed from 45 to 25 mph would reduce the noise levels by approximately 5 dBA;
- During the design of the hotel and convention center, the possibility of building acoustical installing such as double glazed windows, should be evaluated;
- Use of special vibration isolators may be required if there will be any facilities within 500 feet of the alignment that use vibration sensitive instruments. Details of these vibration isolators should be evaluated when the plans for such facilities and their specific equipment become available.

Other Operations

- Mechanical equipment should be acoustically engineered, incorporating mufflers, enclosures, parapets, etc., so that the noise generated by these operations would not exceed the noise standard at receptor locations.
- Truck deliveries and trash pick-up should only be permitted between the hours of 7 a.m. and 7 p.m.
- The project would incorporate design measures that locate noise sources such as loading zones, trash bins, and mechanical equipment as far away from the noise

sensitive receptor locations as possible.

- The design of the facilities and equipment specifications would include noise control measures to ensure that local noise criteria are not exceeded by equipment operations.
- The final engineering design of the project would be reviewed by a qualified acoustical engineer, and specific noise control recommendation would be provided to ensure compliance of the project with local criteria.
- Noise monitoring would be conducted during the initial stages of operations to determine compliance with local noise criteria. In the event that the noise criteria are exceeded, the operations would be reviewed to determine further noise control measures.

2. Traffic and Circulation

Traffic signal installation

The following study intersections will require signalization under both the existing-plus-approved projects (non-Project) and the Total (with-Project) traffic conditions:

- Camino de la Plaza at Willow Road
- Via de San Ysidro at I-5 northbound on- and off-ramps
- Dairy Mart Road at I-5 southbound on- and off-ramps

In addition, it is likely that all major driveways to the Project along Camino de la Plaza will require signalization. This will be studied further as the site plan is refined and finalized.

Intersection Improvements

The following improvements are recommended at study intersections to achieve acceptable levels of service:

- *Camino de la Plaza at I-5 southbound on- and off-ramps:* The addition of a southbound right-turn lane on the off-ramp is required to achieve LOS D. This will require widening of the I-5 southbound off-ramp.
- *East San Ysidro Boulevard at I-5 northbound on- and off-ramps:* The restriping of the eastbound approach to provide a left/U-turn lane, an optional through-or-right-turn lane and a right-turn lane is required to achieve LOS D. This improvement requires two receiving lanes on the approach to the northbound on-ramp. (However, if the San Ysidro Intermodal Transportation Center improvements proceed regardless of the International Gateway of the Americas Project, different circulation recommendations will be implemented as described in *San Ysidro Intermodal Transportation Center Draft Traffic and Circulation Study*, December 1997, BRW.)
- *Via de San Ysidro Boulevard at I-5 southbound off-ramp/Calle Primera:* The widening of the southbound approach at Calle Primera to provide a left-turn lane, an optional through-or-left-turn lane and a right-turn lane is required to achieve LOS D.

Dairy Mart Road at I-5 southbound on- and off-ramps: The addition of a northbound lane to provide one through and one optional through-or-right-turn lane on the northbound approach is required to achieve LOS D at this intersection. Since Dairy Mart Road currently has only one lane northbound, this improvement will require the widening of the Dairy Mart Road south of the intersection as well as the widening of the Dairy Mart Road overcrossing of the I-5 which currently has one travel lane in each direction and a left-turn lane.

Dairy Mart Road at Camino de la Plaza: The addition of a free-flow right-turn lane on the westbound approach is required to achieve acceptable levels of service at this location. This will require widening of Dairy Mart Road north of the intersection to accommodate two travel lanes northbound. (Alternatively, installation of a traffic signal will mitigate this impact.)

Levels of service with project mitigation are shown on Table 2.

VI. PUBLIC REVIEW DISTRIBUTION:

A draft copy of this Mitigated Negative Declaration was published in the San Diego Union and Daily Transcript. Draft copies or Notice of this Mitigated Negative Declaration were distributed to: Councilman Vargas, Council District 8

Federal Agencies

Army Corp of Engineers
Federal Highway Administration
Federal Transit Administration
General Services Administration
International Boundary and Water
Commission
U.S. Attorney
U.S. Border Patrol
U.S. Customs Service
U.S. Immigration and Naturalization Service

State Agencies

Calif. Department of Fish & Game
Caltrans, District 11
Caltrans, Planning
Office of Historic Preservation
Office of Planning & Research,
State Clearinghouse
Regional Water Quality Control Board,
San Diego Region 9
State Coastal Commission
California Integrated Waste Mgmt. Bd.

County of San Diego

Air Pollution Control District
Dept. Of Env. Health Services,
Hazardous Materials Mgmt. Div.

City of San Diego

Building Inspection Dept.
City Attorney
City Manager
Councilman Vargas, Council District 8
Development & Environmental Planning
Engineering & Development Dept.
Facilities Planning
Transportation Planning Division.
Fire Department
Historic Site Board
Mayor's Office
Noise Abatement
Park and Recreation Dept.
Park and Recreation Board
Park Development and Open Space
Division
Planning Department
Police Department
Property Department
Water Utilities Department

Other Agencies, Organizations and Individuals

Ahora Now
Casa Familiar/Amanecer
Chula Vista City School District

**Other Agencies, Organizations and
Individuals (cont.)**

City of Chula Vista
City of Imperial Beach
Community Planners Committee
(Council)
County of San Diego Office of
Education
Economic Development Corporation
Metropolitan Transit Development Board
(MTDB)
Otay Mesa Development Council
Otay Mesa/Nestor Community Planning
Group
San Diego Audubon Society
San Diego Association of Governments
San Diego Community College District
San Diego County Archaeological Society
San Diego County Office of Education
San Diego County Water Authority
San Diego Daily Transcript, Bill Burris
San Diego Gas & Electric Company
San Diego Housing Commission
San Diego Hoy
San Diego Transit Corporation
San Diego Unified School District
San Ysidro Chamber of Commerce
San Ysidro Community Center
San Ysidro Health Center
San Ysidro Park & Recreation
San Ysidro Planning and Development Group
San Ysidro Project Area Committee
San Ysidro Rotary Club
San Ysidro School District
San Ysidro Senior Citizen's Center
San Ysidro Service Center-MAAC Project
San Ysidro Visitors Information Center
Sierra Club
South Bay Union School District
Southwestern Community College
Sweetwater Union District
Tijuana River National Estuarine Sanctuary
United Border Communities Town Council

VII. RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received, but did not address the finding of the draft Mitigated Negative Declaration or the accuracy or completeness of the Initial Study. No response is necessary. The letters are attached.
- (X) Comments addressing the findings of the draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received. Responses to these comments and the letters of comment are attached.

Copies of the draft Mitigated Negative Declaration and Special Studies are available for review or for purchase at the cost of reproduction in the office of the Redevelopment Agency, 202 C Street, 3rd Floor, San Diego, CA 92101-3863.

Patricia K. Hightman

Patricia K. Hightman, Deputy
Executive Director, Redevelopment Agency

Mar 11, 1998

Date of Draft Report

April 24, 1998

Date of Final Report

City of San Diego
REDEVELOPMENT AGENCY
City Administration Building, MS 3A
202 "C" Street
San Diego, CA 92101
(619) 236-6207

CEQA INITIAL STUDY

SUBJECT: INTERNATIONAL GATEWAY OF THE AMERICAS PROJECT. DISPOSITION & DEVELOPMENT AGREEMENT for development of a largely vacant site for various retail (approximately 574,000 square feet), office (approximately 122,500 square feet), federal inspection (approximately 45,000 square feet), hotel/conference center (approximately 250,000 square feet) and university/cultural center (approximately 50,000 square feet) uses. Rerouting of the San Diego Trolley and other transit vehicles, as well as improved pedestrian access to Mexico, are also included as part of this project.

The proposed project is located west of the International Border Crossing in the San Ysidro Community Planning Area, City of San Diego, San Diego County, California.

Applicant: LandGrant Development, Inc. and the Redevelopment Agency of the City of San Diego.

I. PROJECT PURPOSE AND MAIN FEATURES:

INTRODUCTION

The proposed project is an implementing action of the San Ysidro Redevelopment Plan. The Redevelopment Plan Final Environmental Impact Report (FEIR) is a programmatic document that was prepared to address environmental impacts associated with all proposed actions within the San Ysidro Redevelopment Plan area. Since the proposed project is consistent with the Redevelopment Plan, general and cumulative environmental impacts associated with site development were addressed in the EIR. However, further environmental review is required for the project as a result of the availability of more refined and detailed project-specific information. This Initial Study has been prepared to address project-specific impacts that were not adequately covered in the Programmatic EIR.

The Federal Transit Administration will be involved with the proposed project as a potential funding agency for the Light Rail Transit (LRT) bridge at Interstate-5 (I-5). The federal General Services Administration owns federal land at Virginia Avenue, and thus will be affected as a property owner. Consequently, compliance with the National Environmental Policy Act (NEPA) will be required for this project. NEPA compliance will be completed as a separate action.

Because of the project's impact to a state highway, Caltrans will be a key responsible agency. The MTDB will be involved as a responsible agency for approval of the LRT portion of the project.

Redevelopment Agency activity for this project includes: coordination with responsible federal, state and local agencies; cooperation with the owner participant; property acquisition; relocation of tenants and owners; demolition of structures; construction of public improvements; land disposition for private development; imposition of continuing land use controls; and assistance in the provision of financing for all of the above. All such Agency activity will occur only when sufficient financial resources are available and when such activities will produce effective and

immediate redevelopment results.

Since implementation activity will occur as sufficient financial resources are available, redevelopment activity is intended to be phased over a period of time. All implementation activities will be subject to future review and approval by the City Council, and other appropriate bodies, including input from affected residents and other interested parties.

PROJECT CHARACTERISTICS

LandGrant Development, in conjunction with the City of San Diego Redevelopment Agency, is the owner participant that proposes to develop the under-utilized site in phases. Construction on Development Parcel A is expected to commence in Spring 1999. The property is largely vacant, with the exception of a few private businesses and homes and the former Virginia Avenue Commercial Port of Entry to be acquired from the federal government. The project as proposed includes a factory outlet mall, specialty shopping and entertainment complex, hotel, and World Trade Center. Proposed land uses are shown according to development parcels in Figure 2. Planned gross square footage for each land use category is presented in Table 1.

A key project component is the rerouting of the San Diego Trolley, and other transit vehicles, from San Ysidro Boulevard across the I-5 freeway to a planned intermodal transportation facility at the project site. Extension of the trolley across I-5 would entail construction of a new bridge adjacent to the existing Camino de la Plaza freeway interchange. Transit center users, mall patrons and others would be afforded direct pedestrian access to Avenida Revolución in Mexico via a proposed bridge across the Tijuana River.

It is noted that MTDB is proposing to improve the existing San Ysidro Intermodal Center. The MTDB project is completely separate and will be addressed in an individual CEQA/NEPA document.

PROJECT OBJECTIVES

The objectives of the International Gateway of the Americas project are as follows:

1. Maintain the economic viability of the Project Area and enable the reversal of blighting conditions.
2. Generate tax increment revenue to facilitate development and finance public infrastructure.
3. Enhance the development of viable and active employment base opportunities for the residents and businesses located in the San Ysidro Redevelopment Project Area.

II. ENVIRONMENTAL SETTING:

SITE LOCATION AND DESCRIPTION

The proposed project site is located at the southernmost portion of the San Ysidro Redevelopment Plan Area, City of San Diego, California. As shown on Figure 1, the 80-acre project site is located immediately west of I-5 and north of the International Border in the San Ysidro community. Regional access to the project area from the north is provided by I-5, I-805 and the LRT.

EXISTING LAND USES

The project site is predominantly vacant. The site is crisscrossed with unpaved roads that are used by the Border Patrol. The former Virginia Avenue Commercial Port of Entry is located at the eastern portion of the site. Along Camino de la Plaza between Virginia and Louisiana Avenues, there are three small businesses. There are also three residences in the same vicinity within the boundaries of the project site.

Surrounding land uses include retail and multi-family residential uses to the north; parking and the International Border crossing station to the east; Tijuana River and Tijuana River Valley Preserve to the south and west. The Coral Gate residential development is currently under construction to the immediate west.

III. ENVIRONMENTAL ASSESSMENT CHECKLIST:

The following Environmental Checklist was completed according to requirements contained in Section 15063 of the CEQA Guidelines. It is designed to identify the potential for significant environmental impacts which could be associated with a project. Environmental effects identified on the checklist that could possibly be significant are checked with a "yes" or "maybe." The "no" check indicates that the particular impact would either not exist or not be significant. A brief discussion of impact for each issue area is provided in Section IV.

CEQA ENVIRONMENTAL CHECKLIST FORM AND INITIAL STUDY

I. Background

1. Name of Proponent: LandGrant Development
2. Address and Phone Number of Proponent: 12625 High Bluff Drive
Suite 212, San Diego, CA 92130 (619)481-0094
3. Date of Checklist Submission: February 23, 1998
4. Agency Requiring Checklist: City of San Diego, Redevelopment Agency
5. Name of Proposal, if applicable: International Gateway of the Americas

II. Environmental Impacts

1. <u>Earth.</u> Will the proposal result in:	YES	MAYBE	NO
a. Unstable earth conditions or in changes in geologic substructures?	_____	_____	___X
b. Disruptions, displacements, compaction or overcovering of the soil?	_____	_____	___X
c. Change in topography or ground surface relief features?	_____	_____	___X
d. The destruction, covering, or modification of any unique geologic or physical features?	_____	_____	___X
e. Any increase in wind or water erosion of soils, either on or off the site?	_____	_____	___X
f. Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean of any bay, inlet, or lake?	_____	_____	___X
g. Exposure of people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure or similar hazards?	_____	___X	_____

2. Air. Will the proposal result in:

YES MAYBE NO

- | | | | |
|---|-------|---------|---------|
| a. Substantial air emissions or deterioration of ambient air quality? | _____ | ___X___ | _____ |
| b. The creation of objectionable odors? | _____ | _____ | ___X___ |
| c. Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally? | _____ | _____ | ___X___ |

3. Water. Will the proposal result in:

- | | | | |
|---|-------|-------|---------|
| a. Changes in currents, or the course or direction of water movements, in either marine or fresh water? | _____ | _____ | ___X___ |
| b. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff? | _____ | _____ | ___X___ |
| c. Alterations to the course or flow of flood waters? | _____ | _____ | ___X___ |
| d. Change in the amount of surface water in any water body? | _____ | _____ | ___X___ |
| e. Discharge into surface waters or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen, or turbidity? | _____ | _____ | ___X___ |
| f. Alteration of the direction or rate of flow of ground waters? | _____ | _____ | ___X___ |
| g. Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations? | _____ | _____ | ___X___ |
| h. Substantial reduction in the amount of water otherwise available for public water supplies? | _____ | _____ | ___X___ |
| i. Exposure of people or property to water related hazards such as flooding or tidal waves? | _____ | _____ | ___X___ |
| j. Significant changes in the temperature, flow, or chemical content of surface thermal springs? | _____ | _____ | ___X___ |

4. <u>Plant Life</u> . Will the proposal result in:	YES	MAYBE	NO
a. Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, and aquatic plants?)	_____	_____	___X
b. Reduction of the number of any unique, rare or endangered species of plants?	_____	___X	_____
c. Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?	_____	_____	___X
d. Reduction in acreage of any agricultural crop?	_____	_____	___X
5. <u>Animal Life</u> . Will the proposal result in:			
a. Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and shellfish, benthic organism, or insects)?	_____	_____	___X
b. Reduction of the numbers of any unique, rare or endangered species of animals?	_____	___X	_____
c. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?	_____	_____	___X
d. Deterioration to existing fish or wildlife habitat?	_____	_____	___X
6. <u>Noise</u> . Will the proposal result in:			
a. Increase in existing noise levels?	___X	_____	_____
b. Exposure of people to severe noise levels?	_____	___X	_____
7. <u>Light and Glare</u> . Will the proposal produce new light or glare?			
	_____	_____	___X
8. <u>Land Use</u> . Will the proposal result in a substantial alteration of the present or planned land use of an area?			
	_____	_____	___X

- | | YES | MAYBE | NO |
|---|-------|-------|-------|
| 9. <u>Natural Resources</u> . Will the proposal result in: | | | |
| a. Increase in the rate of use of any natural resources? | _____ | _____ | ___X |
| b. Substantial depletion of any nonrenewable natural resource? | _____ | _____ | ___X |
| 10. <u>Risk of Upset</u> . Will the proposal result in: | | | |
| a. A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation) in the event of an accident or upset conditions? | _____ | _____ | ___X |
| b. Possible interference with an emergency response plan or an emergency evacuation plan? | _____ | _____ | ___X |
| 11. <u>Population</u> . Will the proposal alter the location, distribution, density, or growth rate of the human population of an area? | _____ | _____ | ___X |
| 12. <u>Housing</u> . Will the proposal affect existing housing, or create a demand for additional housing? | _____ | _____ | ___X |
| 13. <u>Transportation/Circulation</u> . Will the proposal result in: | | | |
| a. Generation of substantial additional vehicular movements? | _____ | ___X | _____ |
| b. Effects on existing parking facilities, or demand for new parking? | _____ | ___X | _____ |
| c. Substantial impact upon existing transportation systems? | _____ | ___X | _____ |
| d. Alteration to present patterns of circulation or movement of people and/or goods? | _____ | ___X | _____ |
| e. Alterations to waterborne, rail, or air traffic? | _____ | _____ | ___X |
| f. Increase in traffic hazard to motor vehicles, bicyclists or pedestrians? | _____ | ___X | _____ |
| 14. <u>Public Services</u> . Will the proposal have an effect upon, or result in a need for new or altered | | | |

governmental services in any of the following areas:

YES MAYBE NO

- | | | | |
|---|-------|-------|------|
| a. Fire protection? | _____ | _____ | ___X |
| b. Police protection? | _____ | _____ | ___X |
| c. Schools? | _____ | _____ | ___X |
| d. Parks or other recreational facilities? | _____ | _____ | ___X |
| e. Maintenance of public facilities, including roads? | _____ | _____ | ___X |
| f. Other governmental services? | _____ | _____ | ___X |

15. Energy. Will the proposal result in:

- | | | | |
|---|-------|-------|------|
| a. Use of substantial amount of fuel or energy? | _____ | _____ | ___X |
| b. Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy? | _____ | _____ | ___X |

16. Utilities. Will the proposal result in a need for new systems, or substantial alterations to the following utilities:

- | | | | |
|------------------------------|-------|-------|------|
| a. Power or natural gas? | _____ | _____ | ___X |
| b. Communication systems? | _____ | _____ | ___X |
| c. Water? | _____ | _____ | ___X |
| d. Sewer or septic tanks? | _____ | _____ | ___X |
| e. Storm water drainage? | _____ | _____ | ___X |
| f. Solid waste and disposal? | _____ | ___X | ___ |

17. Human Health. Will the proposal result in:

- | | | | |
|--|-------|-------|------|
| a. Creation of any health hazard or potential health hazard (excluding mental health)? | _____ | _____ | ___X |
| b. Exposure of people to potential health hazards? | _____ | _____ | ___X |

18. Aesthetics. Will the proposal result in the obstruction of any scenic vista or view open to

_____ _____ ___X

	YES	MAYBE	NO
the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?			
19. <u>Recreation</u> . Will the proposal result in an impact upon the quality or quantity of existing recreational opportunities?	_____	_____	___X
20. <u>Cultural Resources</u> .			
a. Will the proposal result in the alteration of or the destruction of a prehistoric or historic archaeological site?	_____	_____	___X
b. Will the proposal result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?	_____	_____	___X
c. Does the proposal have the potential to cause a physical change which would affect unique ethnic cultural values?	_____	_____	___X
d. Will the proposal restrict existing religious or sacred uses within the potential impact area?	_____	_____	___X
21. <u>Mandatory Findings of Significance</u> .			
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	_____	_____	___X
b. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief definitive period of time while long-term impacts will endure well into the future.)	_____	_____	___X
c. Does the project have impacts which are	_____	_____	___X

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

- d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

_____ X

NOTE: Authority cited: Section 21083, Public Resources Code; Reference: Section 21001 and 21068, Public Resources Code.

IV. EXPLANATION OF CHECKLIST DETERMINATIONS

A discussion of each of the question responses listed in the Environmental Checklist Form is presented in this section. Questions have been answered in order and each answer evaluates the environmental consequences of the proposed project, if any, and states a conclusion. Answers have been structured to deal with each question comprehensively and literally. Supporting information and/or data have been provided where appropriate. In certain cases questions relating to one topic are answered collectively, while in other instances each lettered question is dealt with individually.

1. **EARTH.** Will the proposal result in: a) Unstable earth conditions or in changes in geologic substructures?; b) Displacements, compaction or overcovering of the soil?; c) Change in topography or ground surface relief features?; d) The destruction, covering or modification of any unique geologic or physical features?; e) Any increase in wind or water erosion of soils, either on or off the site?; f) Changes in deposition or erosion of beach sands, or changes in siltation, deposition, or erosion which may modify or change the course of a river or stream or the bed of the ocean or any bay, inlet or lake?; g) Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

a. and b. The project site is underlain by the Pleistocene age Bay Point Formation, consisting of marine and nonmarine sandstone that is pale brown, fine- to medium-grained, and poorly consolidated. The marine part of the Bay Point Formation is fossiliferous and interfingers with nonmarine unfossiliferous sandstone.

The project site is relatively level and buildings are to be constructed on a concrete slab. Hence, extensive grading will not be required during site preparation. It is anticipated that the results of a soils report will be incorporated into the project's design and grading plan. Given these considerations, adverse effects associated with geologic conditions are not expected.

c. and d. The existing topography of the site is relatively flat. There is evidence of extensive dumping activity on portions of the site. Topographic modifications associated with the proposed project will be minor. There are no unique geologic or physical features that would be affected by the proposed project. Given these considerations, no significant adverse impact on the earth environment will result from the proposed project.

e. and f. According to USDA Soil Survey - San Diego Area, California (Soils Sheet No. 72), site soils are classified as Tujunga Sand (TuB). This soil type is found on alluvial fans of less than five percent slope. They range from pale brown and very pale brown in color and from coarse sand to loamy fine sand in texture. The soils in this unit are very deep with a slight to moderate erosion hazard.

The majority of the project site consists of an open field, some of which has no vegetation. Much of the site will be covered with impervious surfaces after construction of the proposed project. However, existing drainage patterns will be largely maintained. While site runoff during project operation will occur at a faster rate than under present conditions, there will be less exposed surfaces and consequent erosion occurring. The project proponent must also adhere to erosion control measures described in Section 4.9.4 of the San Ysidro Redevelopment Plan FEIR.

The project will not affect the beach environment or cause substantial siltation of any water course.

g. San Diego, like all of southern California, is located within an earthquake-prone region.

Active, regional faults are described in the San Ysidro Redevelopment Plan FEIR. Although the project vicinity is not considered to be a geologically hazardous area, some degree of seismic risk is inherent to occupants of all structures. However, mandatory compliance with applicable structural requirements of the State of California Seismic Safety Code and the Uniform Building Code will result in a project design that is expected to reduce this risk to locally and regionally acceptable levels. The project proponent must also adhere to mitigation measures described in Section 4.9.4 of the San Ysidro Redevelopment Plan FEIR. Given these considerations, significant adverse effects associated with an unacceptable level of region-wide seismic risk are not expected.

2. AIR. Will the proposal result in: a) Substantial air emissions or deterioration of ambient air quality?; b) The creation of objectionable odors?; c) Alteration of air movement, moisture or temperature, or any change in climate either locally or regionally?

a. According to the San Ysidro Redevelopment Plan FEIR, construction activities associated with the Redevelopment Project would not generate significant dust emissions. Nevertheless, the project proponent will adhere to dust control measures described in Section 4.4.4 of the FEIR.

According to the San Ysidro Redevelopment Plan FEIR, regional air quality impacts from implementation of the Redevelopment Plan would not be significant. These individual and cumulative air quality impacts are primarily caused by the use of passenger vehicles. Because "International Gateway of the Americas" would be consistent with the Redevelopment Plan and would result in substantially fewer average daily vehicle trips than anticipated in the FEIR, it follows that regional air quality impacts from implementation of the proposed project would also not be significant.

The FEIR addresses cumulatively significant air emissions that contribute to the sub-regional and regional air pollution burden. Transportation tactics which have been developed by the Air Pollution Control District and SANDAG to reduce air quality emissions on a regional basis are listed in Section 4.4.4 of the FEIR. The proposed project includes a new intermodal transit center, surface and structure parking, and a pedestrian bridge from the site into Mexico. These project components are expected to result in improved local vehicular circulation, easier access to rapid transit, and reduced vehicular and increased pedestrian movement across the border. All of these improvements are expected to benefit regional air quality.

b. The project's function is not conducive to the creation of objectionable odors.

c. The project could not cause alteration of air movement, or any change in climatic conditions either locally or regionally.

3. WATER. Will the proposal result in: a) Changes in currents, or the course or direction of water movements, in either marine or fresh waters?; b) Changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?; c) Alterations to the course or flow of flood waters?; d) Change in the amount of surface water in any water body?; e) Discharge into surface waters, or in any alteration of surface water quality, including, but not limited to, temperature, dissolved oxygen or turbidity?; f) Alteration of the direction or rate of flow of groundwaters?; g) Change in the quantity of groundwaters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?; h) Substantial reduction in the amount of water otherwise available for public water supplies?; I) Exposure of people or property to water

related hazards such as flooding or tidal waves?

a., b., c., d., e., f., g., h., I. The proposed project is located to the north of the Tijuana River levee and appears to drain away from the river. Runoff from the site during construction may result in minor, localized increases in the turbidity of storm sewer discharge. Since the project site is larger than five acres, construction must occur in compliance with the State Water Resources Control Board's general stormwater permit for construction. Therefore, it is concluded that the project should have no significant effect on the form, flow, quality, or use of any existing surface water course. Information on groundwater conditions under the project site was not available for this review; however, impacts to the quality or flow of groundwater in the project area during project construction are highly unlikely. Therefore, significant environmental impacts to surface water or groundwater resources will not occur as a result of the proposed project.

- 4. PLANT LIFE. Will the proposal result in: a) Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, microflora, and aquatic plants)? b) Reduction of the numbers of any unique, rare or endangered species of plants?; c) Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?; d) Reduction in acreage of any agricultural crop?**

a., b., c., d. A site-specific biological assessment was prepared for this project by Pacific Southwest Biological Services, Inc. (PSBS) and is available for review on request. The commercial development and trolley extension sites are highly disturbed and consists of non-native ruderal (weedy) vegetation, exposed dirt and pavement. Drainage channels on the site can be classified as "waters of the United States" and are subject to U.S. Army Corps of Engineers jurisdiction. No unique, rare, or endangered species of plants would be expected to inhabit this land. Since the project vicinity is largely urban and contains sparse native vegetation, the project will not introduce new species to the area. The project will have no affect on any agricultural crop. Given these considerations, there will be no anticipated impacts to plant life associated with the commercial and LRT portions of the project.

A mitigation measure for project traffic impacts entails the addition of one lane to a portion of Dairy Mart Road from I-5 to just south of the Dairy Mart Road/Servando Avenue intersection. Field observations have been conducted along this section of Dairy Mart Road by PSBS. This roadway segment can be widened without causing direct or indirect impacts to wetlands. Implementation of this measure will be designed to avoid impacts to wetlands or sensitive plants in the road vicinity.

- 5. ANIMAL LIFE. Will the proposal result in: a) Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and shellfish, benthic organisms, insects or microfauna)?; b) Reduction of the numbers of any unique, rare or endangered species of animals?; c) Introduction of new species of animals into an area, or result in a barrier to the migration of movement of animals?; d) Deterioration to existing fish or wildlife habitat?**

a., b., c., d. Because of the nature of the commercial development and trolley extension sites, there will be no impact to the distribution or diversity of local fauna in these areas. No rare or endangered species of animals would be expected or are known to inhabit this land. Given these considerations, there will be no anticipated impacts to animal life associated with the commercial development and trolley extension sites.

As discussed above, mitigation for traffic would require the addition of one lane to a portion of Dairy Mart Road. Implementation of this measure will be designed to avoid direct or indirect effects to sensitive animals. Construction work along Dairy Mart Road will be conducted between August and March to avoid the breeding season of the least Bell's vireo.

6. NOISE. Will the proposal result in: a) Increases in existing noise levels?; b) Exposure of people to severe noise levels.

a., b. Noise effects from project construction and operation have been assessed in a special report by Parsons Transportation Group. This report is summarized below. Noise and vibration impact criteria and terminology are described in the full report, a copy of which can be made available upon request.

Construction Noise

The noise levels created by construction equipment will vary greatly depending on factors such as the type of equipment, the specific model, the operation being performed, and the condition of the equipment. The equivalent sound level (Leq) of the construction activity also depends on the fraction of time that the equipment is operated over the time period of construction.

During the construction period, some of the sensitive receptors that are close to the project site would notice the noise. Most of the building construction would occur at least 400 feet south of Camino de La Plaza. The area immediately south of Camino de La Plaza, which is closest to the apartments and school playground, will be the parking lot with minimal construction activities. During grading and paving operations of the parking lot, the construction noise could reach 85 and 87 decibels (dBA), respectively, at the front of apartments located north of Camino de La Plaza. However, noise due to this construction would be short-term and limited to daytime hours.

There is a good possibility that pile drivers will be used for the construction of the over-pass bridge crossing the I-5 for the trolley. However, there are no sensitive receptors near this crossing.

Construction Vibration

The construction activities that typically generate the most severe vibrations are impact pile driving. Construction of the bridge for the LRT over the I-5 would require placement of pile columns. Pile columns could be cast in drilled holes or driven pre-cast or steel piles. Currently, the procedure for pile placement has not been determined. The ground-borne vibration generated by pile driving, the worst case scenario, would be in the perceptible range at the nearby buildings.

Train Operations Noise

Noise from the LRT operations were calculated based on the assumption that a trolley arrives and departs every 7.5 minutes with about four cars per train. This would be the worst case. There will be periods of less frequent service and shorter trains. A 45 mph speed was assumed for a train traveling to and from the station platform.

The end point of the trolley will be the closest point to the residential sites located north of Camino de la Plaza and the school. Distances to the closest apartment building and the school would be approximately 800 and 1,500 feet, respectively. Trolley noise levels would not be noticeable at the school and apartments due to the distance and blockage provided by the proposed factory outlet buildings. Thus, no significant adverse noise impacts are anticipated at the residential locations and school.

The trolley will be traveling next to the Bi-National Inspection Services building and hotel and convention center. Expected one hour Lmax and Leq from the trolley operation at the facade of these two buildings would be 80 dBA and 61 dBA, respectively. Therefore, the estimated Lmax generated by train operations at these buildings would not result in a noise impact when compared with the American Public Transit Association (APTA) noise criteria of 85 dBA. According to the FTA noise criteria, the predicted Leq of 61 dBA could have noise impacts if the background hourly Leq is less than 53 dBA. The hourly Leq of a typical commercial area is normally more than 65 dBA. Therefore, the estimated Leq generated by train operations at these facilities would not result in a noise impact when compared with the FTA noise criteria.

There is also the potential of noise impact wherever at-grade crossing bells are located within 150 feet of noise sensitive receptors. Warning bells and train whistles would not have any noise impact at the existing apartments sites located north of Camino de la Plaza and the school. Noise impacts could occur from warning bells and train whistles before the grade crossing at the future proposed hotel. The extent of this impact would primarily depend upon the whistle noise levels and how long and how often the whistles would be sounded.

Train Operations Vibration

Ground-borne vibration measurements were conducted at two existing LRT tracks. One set of measurements was conducted along a straight track and another set next to a curved track. The impact threshold vibration level of 75 dB for a commercial facility was not exceeded at a distance of 25 feet from the LRT track. Therefore, there would not be any vibration impact at the Bi-National Inspection Services and convention center buildings which are located approximately 50 feet from the LRT track. Results of vibration monitoring indicated a vibration level of 72 dB at 75 feet. The impact threshold vibration level for a building where people normally sleep is 72 dB. Therefore, there would be a vibration impact if hotel rooms are located 75 feet or closer to the trolley tracks. In addition, any building that uses sensitive vibration instrumentation may be impacted by the vibration from the operation of LRT if it is located within 300 feet. There would be no vibration impact at the apartments located north of Camino de la Plaza and the school due to their distance from the trolley tracks.

Operation Traffic Noise

The main noise source associated with the project is project generated traffic. Traffic movements associated with the project would result in increases in traffic noise along the arterials that are used to access the project site. Apartments located along Camino de la Plaza east of Willow Road would experience an increase of 4 dBA in community noise equivalent level (CNEL) and peak hour Leq as a result of traffic generated by the project. The increase in CNEL and peak hour Leq at the school playground located along Camino de la Plaza west of Willow Road would be approximately 5 dBA. Apartments located along Willow Road would experience an increase in CNEL and peak hour Leq of 1 and 2 dBA, respectively, as a result of traffic generated by the project.

The predicted CNEL in front of apartments located along Camino de la Plaza and Willow Road would be more than 65 dBA as a result of traffic generated by the project. A CNEL of 65 dBA or higher at outdoor usable open space for multifamily units is considered a significant impact. Grassy areas in front of these apartments were being used by children as a play area during the noise study field investigation.

The school playground would be exposed to CNEL of 65 dBA as a result of cumulative traffic generated by the project. These levels would also be considered a significant impact. The

predicted CNEL in front of commercial and retail outlets located along Camino de la Plaza would be less than 70 dBA; therefore, the project generated traffic would not be expected to cause a significant impact.

This noise assessment is consistent with conclusions reached in the San Ysidro Redevelopment Plan FEIR for Willow Road north of Camino de la Plaza. Existing noise levels along this street segment are significant. According to the FEIR, these impacts are cumulatively significant. However, it is noted that the project design incorporates a significant transit component and mix of uses which will result in a reduction of traffic noise impacts on Willow Road from what was previously anticipated in the FEIR.

Other Operation Noise

The mechanical equipment operations at the hotel and office buildings, truck movements and trash pick-up, and parking lot activity will be other major noise sources associated with the project. A discussion of each noise source follows.

Mechanical Equipment - Mechanical equipment such as air conditioners, fans, blowers, compressors, and related equipment often generate noise that would exceed the local noise standards when measured at the nearest noise sensitive receptor locations. Mechanical equipment associated with the project would be expected to be located within the buildings, at least 800 feet away from sensitive receptors, or shielded from the nearby noise sensitive receptors by other buildings. The noise generated by mechanical equipment operations would not be expected to exceed the noise standards at the nearest noise sensitive receptor locations; however, because of the characteristics of mechanical equipment, the noise may be discernible during the late night and early morning time periods.

Truck movements and trash pick-up - The noise produced by deliveries and trash pick-up at the project site are a potential source of annoyance. The Leq within 50 feet of a delivery and trash truck would be approximately 86 dBA during the heaviest periods of activity. However, these operations would be near main buildings which are at least 800 feet away from the sensitive residential receptors, would be intermittent, and would occur for short duration. The noise would not be expected to exceed the noise standards at the nearest noise sensitive receptors and no noise impact would be expected.

Parking Lot Activity - The most noticeable noise associated with parking lot activity is car door slamming. Typical car door slamming generates a maximum sound level (Lmax) of 73 dBA when measured at a distance of 50 feet. The noise generated by car door slamming would be approximately 67 dBA at the nearest residential receptors located north of Camino de la Plaza. The noise generated by car door slamming would comply with the local noise standards and no impact would be expected.

7. LIGHT AND GLARE. Will the proposal produce new light or glare?

The project site is currently undeveloped but is used by the border patrol while searching for illegal immigrants. Consequently, it is well lit at night for security purposes.

Buildings proposed for the site will have interior lighting and exterior security lights similar to all modern commercial developments. The project should be designed to avoid off-site spillage of lighting and minimize effects to adjacent residential properties. The buildings will be designed to adhere to City design standards, therefore, they would not generate significant offsite glare effects. Given these considerations, light and glare impacts associated with the proposed project will not be significant.

8. LAND USE. Will the proposed result in a substantial alteration of the present or

planned land use of an area?

The proposed land use is consistent with existing zoning, community plan, and redevelopment plan designations for the site. Commercial uses are also considered a compatible zone with nearby commercial and multi-family residential uses. For these reasons, land use impacts associated with the proposed project will not be significant.

9. NATURAL RESOURCES. Will the proposal result in: a) Increase in the rate of use of any natural resources?; b) Substantial depletion of any nonrenewable natural resource?

a., b. Development and occupancy of this project will result in the consumption of natural resources in the form of raw materials utilized to fabricate the various construction materials and in the form of water and fossil fuel consumption during construction and operation. Raw materials consumed in conjunction with the proposed project will be so small compared with the cumulative amounts of natural resources being consumed locally, regionally, or nationally, that a substantial effect on the rates of consumption or depletion will not occur. Consequently, such consumption does not represent a significant depletion of any natural resource and no adverse impacts are anticipated.

10. RISK OF UPSET. Does the proposal involve: a) A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation) in the event of an accident or upset conditions?; b) Possible interference with an emergency response plan or an emergency evacuation plan?

a. Generation, storage or treatment of hazardous substances or wastes are not associated with the proposed project. Risk associated with explosions or release of hazardous substances would therefore be considered insignificant for this project.

b. The proposed project would not interfere with any emergency response plan or an emergency evacuation plan.

11. POPULATION. Will the proposal alter the location, distribution, density, or growth rate of the human population of an area?

The project would not substantially alter the human population in the local area.

12. HOUSING. Will the proposed project affect existing housing, or create a demand for additional housing?

The proposed project will result in the removal of three residences. This is not considered a significant amount compared to regional housing demand.

13. TRANSPORTATION/CIRCULATION. Will the proposal result in: a) Generation of substantial additional vehicular movement?; b) Effects on existing parking facilities, or demand for new parking?; c) Substantial impact upon existing transportation systems?; d) Alterations to present patterns of circulation or movement of people and/or goods?; e) Alterations to waterborne, rail, or air traffic?; f) Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?

a. A traffic report has been prepared for this project by Parsons Transportation Group. This report is summarized below and can be made available upon request. The traffic report includes evaluations which are not summarized below, including: existing traffic conditions, non-project traffic conditions, and project trip generation, distribution and assignment.

The International Gateway of the Americas is expected to generate a total of 29,241 new daily

trips ends on the regional network including Mexican roadways. However, it is expected that 15 percent of the new primary trips will be utilizing roadways in Mexico only. Therefore, only 24,855 new daily trips will actually utilize roadways within the United States. (It should be noted that the San Ysidro Redevelopment Project was approved under the assumption that the Project site (Subarea F in the redevelopment project) would generate 37,544 daily trip ends.)

2001 Total (With-Project) Traffic Volumes

Based upon the assignments of 2001 existing-plus-approved projects (non-Project) traffic volumes and the assignment of Project traffic volumes, assignments of 2001 Total (existing-plus-approved-projects and Project) traffic volumes were made to evaluate 2001 traffic conditions. Total traffic volume assignments for the 2001 evening weekday evening peak hour are shown on Figure 3.

2001 Total (With-Project) Levels of Service

Three of the eight currently unsignalized intersections require signalization for the 2001 existing-plus-approved projects traffic conditions. Hence, all study intersections which satisfied Caltrans' traffic signal Warrant 11 were assumed to be signalized for the 2001 Total traffic conditions. Intersection Capacity Utilization (ICU) methodology was utilized for determining 2001 Total (with-Project) levels of service at these study intersections. The levels of service for the five intersections which did not satisfy traffic signal Warrant 11 were determined utilizing the Highway Capacity Manual methodology for unsignalized intersections.

The analysis of 2001 levels of service with Project traffic was based upon weekday evening peak-hour traffic volumes illustrated on Figure 3 for the Total (with-Project) traffic conditions, and the intersection geometrics, with the following modification: Camino de la Plaza was assumed to be two travel lanes in each direction with a raised median accommodating one-to-two left-turn lanes at main project driveway, including the intersection of Camino de la Plaza at Willow Road.

The intersection configurations and traffic signal locations assumed for this analysis are shown on Figure 4.

Table 1 summarizes 2001 Total (with-Project) levels of service at the study intersections during the weekday evening peak-hour period. As can be seen from Table 1, the two intersections which were projected to operate unacceptably under the 2001 existing-plus-approved projects conditions (East San Ysidro Boulevard at the I-5 northbound on- and off-ramps and Via de San Ysidro at I-5 southbound off-ramp/Calle Primera) continue to operate unacceptably under the 2001 Total (with-Project) traffic conditions. In addition, the intersection of Camino de la Plaza at the I-5 southbound on- and off-ramps is projected to operate at LOS F and the intersections of Dairy Mart Road at I-5 southbound on- and off-ramps and Dairy Mart Road at Camino de la Plaza are projected to operate at LOS E in 2001 with Project traffic. All other signalized and unsignalized intersections are projected to operate acceptably (LOS D or better) for the 2001 Total (with-Project) traffic conditions.

Mitigation measures designed to reduce project and cumulative impacts to below a level of significance are provided in Item V of this Initial Study. With the implementation of intersection improvements, as well as the installation of traffic signals at the intersections of Via de San Ysidro at the I-5 northbound on- and off-ramps; Dairy Mart Road at I-5 southbound on- and off-ramps; Camino de la Plaza at Willow Road and at major project driveways; and the improvement of Camino de la Plaza to its ultimate configuration along the

project frontage, the project impacts will be mitigated.

b. A considerable portion of the project site would be devoted to on-site parking uses. Surface and structural parking is planned for this site. Consequently, the project is not expected to cause a demand for parking beyond what is proposed.

c. With the exception of the commercial vehicular crossing at Virginia Avenue, the existing access routes for vehicular traffic to the site will be maintained. Measures to reduce project impacts to Dairy Mart Road, Camino de la Plaza and the I-5 interchanges with Dairy Mart Road and Camino de la Plaza are included in this project. The proposed project also includes extension of the trolley and alteration of the existing intermodal system, which are intended to have a beneficial effect on local circulation.

d. and f. With the relocation of the trolley terminus and associated intermodal traffic, there will be alterations to present patterns of circulation and movement of people. Alterations to present patterns of circulation and movement of people will also result from the proposed vehicular and pedestrian circulation pattern changes at the border crossing.

The preliminary site plan for this project shows seven access points into the project site, serving surface parking immediately south of Camino de la Plaza as well as a parking structure located adjacent to the Tijuana River. The parking structure will also house the multi-modal transit center, which is proposed to be the terminus station for the San Diego trolley as well as the staging area for the local bus, shuttle and taxi activity.

Camino de la Plaza will be widened to its ultimate configuration (two travel lanes in each direction with opportunities for dual left-turn lanes and deceleration lanes, as necessary) with this Project. It is anticipated that all seven major driveways into the site will require signalization. In designing Camino de la Plaza, consideration should be made to spacing intersections so that efficient progression is provided along the Project frontage. Access points to the developments fronting Camino de la Plaza on the north should be consolidated and aligned with the Project's driveways to maximize both accessibility and traffic operations. Traffic signals should be interconnected to ensure coordination between intersections along Camino de la Plaza. In addition, adequate left-turn storage should be provided at each signalized intersection to eliminate the potential for blocking through lanes of travel. Consideration should be given to a raised median along Camino de la Plaza for aesthetic as well as operational reasons.

A detailed site traffic analysis to evaluate driveway configuration requirements; on-site circulation and parking layout; truck access; access to the parking structure and the multi-modal transit center as well as pedestrian linkages should be conducted once the site plan is refined.

e. The proposed project would include an alteration to the LRT alignment in the immediate vicinity of the border crossing. Construction of the LRT bridge will avoid conflicts with I-5 traffic. The realigned LRT would not directly affect any major surface streets.

f. The proposed project is expected to eliminate traffic hazards that are prevalent at the existing Intermodal Transit Center. With regard to site access, see the discussion above under 13.d.

- 14. PUBLIC SERVICES. Will proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas: a) Fire protection?; b) Police protection?; c) Schools?; d) Parks or other recreational facilities?; e) Maintenance of public facilities, including roads?; f) Other governmental services?**

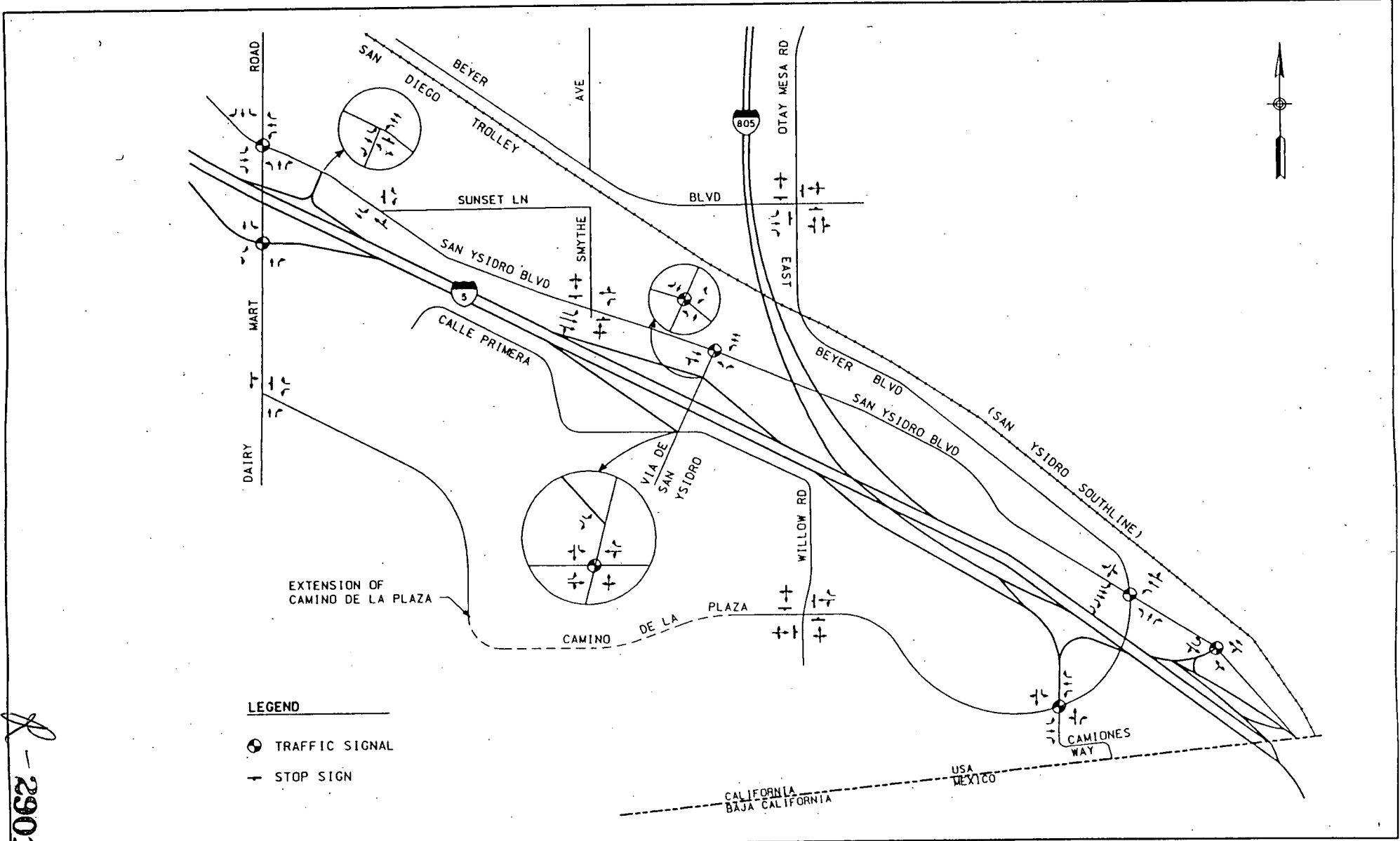
Table 1 (Traffic)
TOTAL (WITH-PROJECT) LEVELS OF SERVICE

SIGNALIZED INTERSECTIONS		
Intersection	ICU¹	LOS²
Camino de la Plaza @ I-5 SB On-/Off-ramps	1.25	F
East Beyer Boulevard @ East San Ysidro Boulevard	0.77	D
East San Ysidro Boulevard @ I-5 NB On-/Off-ramps	1.33	F
East San Ysidro Boulevard @ Via de San Ysidro	0.74	D
San Ysidro Boulevard @ Dairy Mart Road	0.61	C
Camino de la Plaza @ Willow Road	0.67	C
Via de San Ysidro @ I-5 SB Off-ramp/Calle Primera Road	1.20	F
Via de San Ysidro @ I-5 NB On-/Off-ramps	0.71	D
Dairy Mart Road @ I-5 SB On-/Off-ramps	0.96	E
UNSIGNALIZED INTERSECTIONS		
Intersection	Delay³	LOS
San Ysidro Boulevard @ Smythe Avenue	0.7	A
Beyer Boulevard @ Otay Mesa Road/East Beyer Boulevard	2.1	A
San Ysidro Boulevard (east of Dairy Mart Road) @ I-5 NB On-/Off-ramps	0.9	A
Dairy Mart Road @ Camino de la Plaza	42.2	E
San Ysidro Boulevard @ Sunset Lane	0.8	A

1 Intersection Capacity Utilization

2 Level of Service

3 Delay in seconds per vehicle estimated; based upon 1994 *Highway Capacity Manual* (HCM) Methodology



LEGEND

- TRAFFIC SIGNAL
- ⊕ STOP SIGN

R-290105

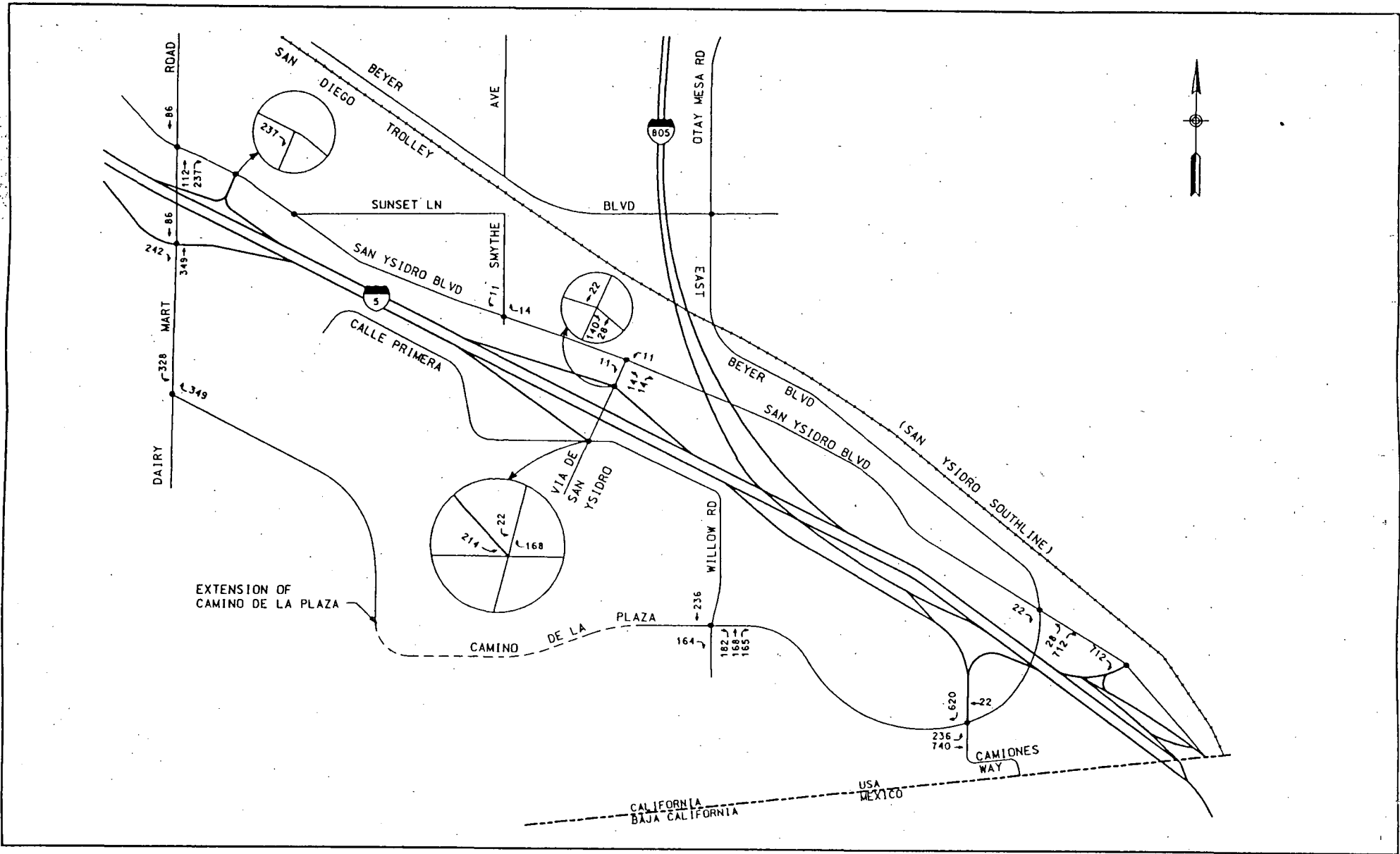
2001 INTERSECTION CONFIGURATIONS

Land Development Review

CITY OF SAN DIEGO REDEVELOPMENT AGENCY



Figure
4



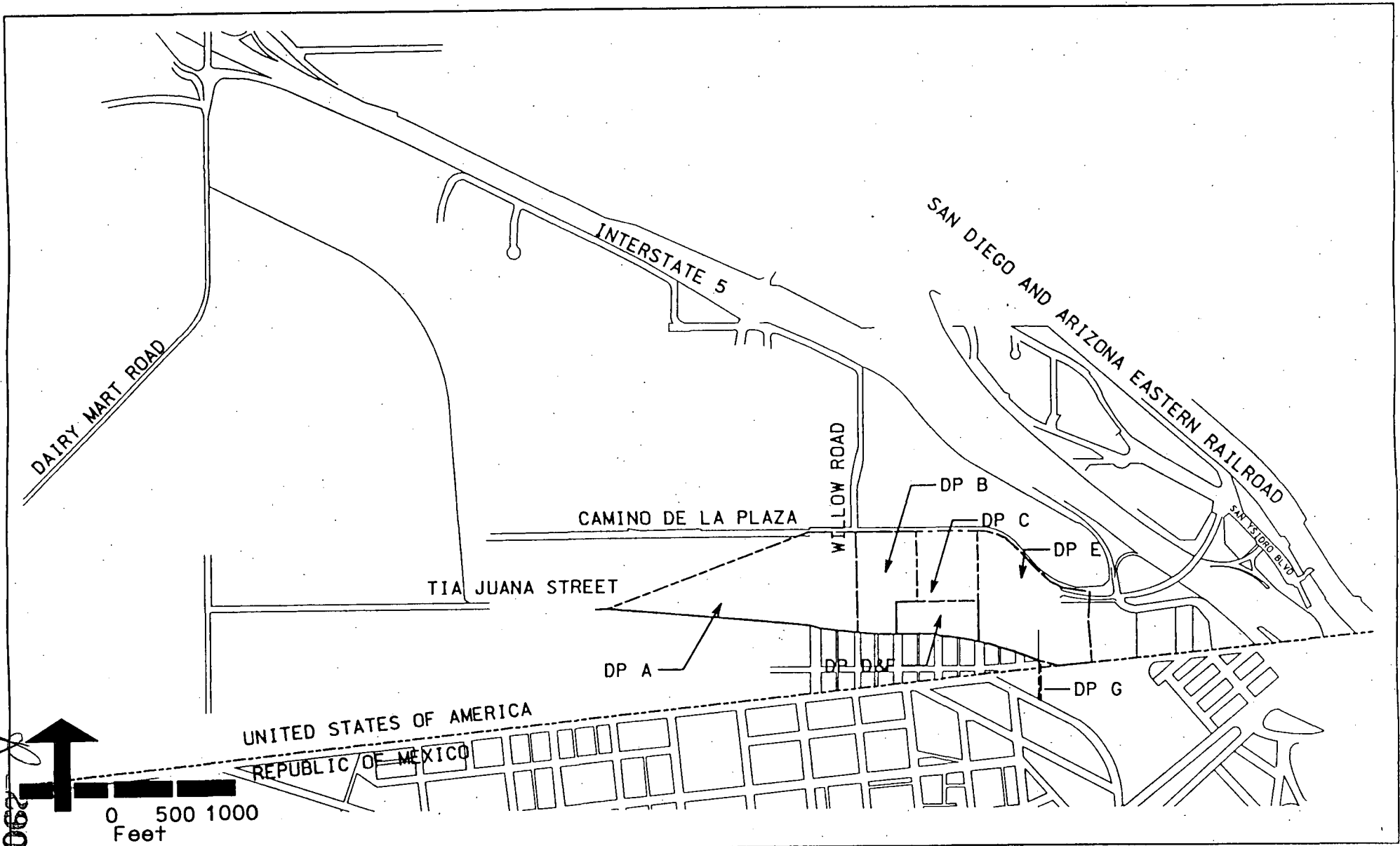
PROJECT WEEKDAY EVENING PEAK HOUR TRIPS

Land Development Review

CITY OF SAN DIEGO REDEVELOPMENT AGENCY



Figure
3



290105

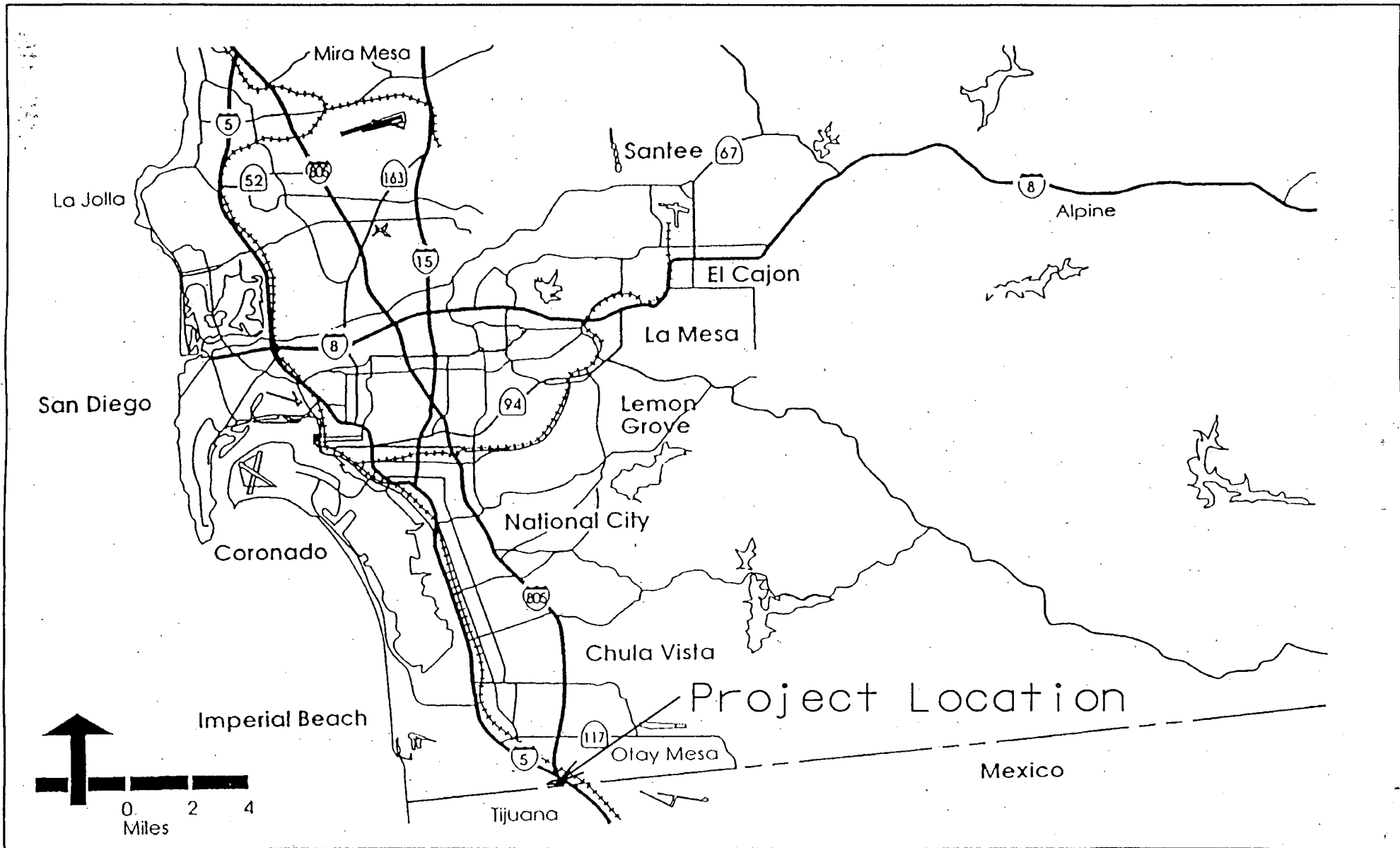


LOCATION MAP - INTERNATIONAL GATEWAY

Land Development Review

CITY OF SAN DIEGO REDEVELOPMENT AGENCY

Figure
2



VICINITY MAP - INTERNATIONAL GATEWAY

Land Development Review

CITY OF SAN DIEGO REDEVELOPMENT AGENCY

Figure
1

VI. Determination

On the basis of this initial evaluation:

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described above have been added to the project. A NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Date: Mar 11, 1998

Patricia K. Hightman
(Patricia K. Hightman)

For San Diego
Redevelopment
Agency

achieve LOS D. This improvement requires two receiving lanes on the approach to the northbound on-ramp. (However, if the San Ysidro Intermodal Transportation Center improvements proceed regardless of the International Gateway of the Americas Project, different circulation recommendations will be implemented as described in *San Ysidro Intermodal Transportation Center Draft Traffic and Circulation Study*, December 1997, BRW.)

- *Via de San Ysidro Boulevard at I-5 southbound off-ramp/Calle Primera:* The widening of the southbound approach at Calle Primera to provide a left-turn lane, an optional through-or-left-turn lane and a right-turn lane is required to achieve LOS D.
- *Dairy Mart Road at I-5 southbound on- and off-ramps:* The addition of a northbound lane to provide one through and one optional through-or-right-turn lane on the northbound approach is required to achieve LOS D at this intersection. This can be achieved by either widening the southbound off-ramp to provide two left-turn and one right-turn lanes plus restriping the bridge to accommodate one southbound and two northbound lanes. Alternatively, the Dairy Mart Road overcrossing of the I-5 which currently has one travel lane in each direction and a left-turn lane could be widened.
- *Dairy Mart Road at Camino de la Plaza:* The addition of a free-flow right-turn lane on the westbound approach is required to achieve acceptable levels of service at this location. This will require widening of Dairy Mart Road north of the intersection to accommodate two travel lanes northbound. (Alternatively, installation of a traffic signal will mitigate this impact.)

Levels of service with project mitigation are shown on Table 2.

enclosures, parapets, etc., so that the noise generated by these operations would not exceed the noise standard at receptor locations.

- Truck deliveries and trash pick-up should only be permitted between the hours of 7 a.m. and 7 p.m.
- The project would incorporate design measures that locate noise sources such as loading zones, trash bins, and mechanical equipment as far away from the noise sensitive receptor locations as possible.
- The design of the facilities and equipment specifications would include noise control measures to ensure that local noise criteria are not exceeded by equipment operations.
- The final engineering design of the project would be reviewed by a qualified acoustical engineer, and specific noise control recommendation would be provided to ensure compliance of the project with local criteria.
- Noise monitoring would be conducted during the initial stages of operations to determine compliance with local noise criteria. In the event that the noise criteria are exceeded, the operations would be reviewed to determine further noise control measures.

2. Traffic and Circulation

Traffic signal installation

The following study intersections will require signalization under both the existing-plus-approved projects (non-Project) and the Total (with-Project) traffic conditions:

- Camino de la Plaza at Willow Road
- Via de San Ysidro at I-5 northbound on- and off-ramps
- Dairy Mart Road at I-5 southbound on- and off-ramps

In addition, it is likely that all major driveways to the Project along Camino de la Plaza will require signalization. This will be studied further as the site plan is refined and finalized.

Intersection Improvements

The following improvements are recommended at study intersections to achieve acceptable levels of service:

- *Camino de la Plaza at I-5 southbound on- and off-ramps:* The addition of a southbound right-turn lane on the off-ramp is required to achieve LOS D. This will require widening of the I-5 southbound off-ramp.
- *East San Ysidro Boulevard at I-5 northbound on- and off-ramps:* The restriping of the eastbound approach to provide a left/U-turn lane, an optional through-or-right-turn lane and a right-turn lane is required to

- A combination of mitigation techniques with equipment noise control and administrative measures can be selected to provide the most effective overall noise reduction for construction activities. Application of the mitigation measures will reduce the construction noise impacts; however, temporary increases in noise and vibration would still occur.

Operation Traffic

Construction of a 6 to 8 foot high wall along the north side of Camino de la Plaza and west of Willow Road would mitigate the cumulative traffic noise impact at the school playground.

Construction of a 6 to 8 foot high wall in front of apartments located along Camino de la Plaza and Willow Road would mitigate future traffic noise impacts. It is noted that construction of such a wall will eliminate direct access of these apartment units to the street. For a wall to be effective, it shall be continuous and designed to minimize openings. Access openings can severely reduce the noise reduction effectiveness of the wall.

Mitigation for these noise impacts are to be shared by developers in the Redevelopment Area whose projects would cumulatively contribute to significant noise impacts along Willow Road and Camino de la Plaza. LandGrant Development shall contribute to a mitigation account, to be established by the Redevelopment Agency for the necessary construction of walls to reduce noise levels to a level of insignificance. Alternatively, they may construct noise barriers along Camino de la Plaza based on their pro-rata share of impact.

Train Operations

The following mitigation measures are recommended to reduce the noise and vibration impact due to the operation of the proposed LRT:

- It is recommended to place the future hotel rooms at a minimum of 150 feet distance from the LRT track to reduce the noise impacts as well as reduce the projected ground-borne vibration effects;
- At the at-grade crossing, ceramic bells should be used and should sound only when gates are on the way down or on the way up. Bells should be silent during the stationary down phase of the gate operations;
- It is recommended that the train speed be maintained at 25 mph or less starting west of the I-5 over crossing. Reducing the train speed from 45 to 25 mph would reduce the noise levels by approximately 5 dBA;
- During the design of the hotel and convention center, the possibility of building acoustical installing such as double glazed windows, should be evaluated;
- Use of special vibration isolators may be required if there will be any facilities within 500 feet of the alignment that use vibration sensitive instruments. Details of these vibration isolators should be evaluated when the plans for such facilities and their specific equipment become available.

Other Operations

- Mechanical equipment should be acoustically engineered, incorporating mufflers,

not be significant with the project as planned.

- Cumulative air quality and solid waste impacts are assessed in the San Ysidro Redevelopment Plan FEIR and will be mitigated with implementation of the Mitigation Monitoring and Reporting Program (Butler Roach Group, March 1996) prepared for the Plan.
- Traffic and noise impacts specific to the proposed project have been analyzed in special studies. Measures have been incorporated into the project to avoid potentially significant adverse environmental effects on human beings.

V. Mitigation Measures Incorporated Into Project

1. Noise and Vibration

Construction

The following noise control measures shall be implemented in order to minimize noise and vibration disturbances at sensitive receptors during construction activities:

Equipment Noise Control

- Use equipment with improved noise muffling and ensure that all equipment items have the manufacturers' recommended noise abatement measures, such as mufflers and engine covers, and that engine vibration isolators are intact and operational. Such equipment will generally be quieter in operation than older equipment. All construction equipment should be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers, shroud, etc.).
- Use hydraulic tools instead of pneumatic impact tools.
- Turn off idling equipment.
- Maximize the physical separation, to the extent feasible, between noise generators and noise receptors.

Administrative Measures

- Construction activities shall be limited to daytime hours, 7:00 a.m. to 7:00 p.m. Nighttime or late evening construction shall not be allowed near sensitive receptors. No noise-generating construction activities shall take place on Saturdays, Sundays, and holidays.
- Plan noisier operations during times of highest ambient noise levels.
- Keep noise levels relatively uniform and avoid impulsive noises.
- Coordinate high vibration generating operations with the future users of any nearby vibration sensitive instruments.
- Truck deliveries and haul-off shall only be permitted between the hours of 7:00 a.m. and 7:00 p.m. Heavy trucks shall be routed over streets that will cause the least disturbance to residences or business in the vicinity of the project site.
- Place any maintenance yard, batch plant, and other construction oriented operations in locations which would be the least disruptive to the community.
- Maintain good public relations with the community to minimize objections to the impact of unavoidable construction noise. The noise impacted communities should be notified in advance of the construction schedule.

not be significant.

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

The proposed project should have no direct impacts to existing recreational facilities. Improved access to the area via Dairy Mart Road may also have an indirect positive affect on Larsen Field and Border Field State Park.

20. CULTURAL RESOURCES. a) Will the proposal result in the alteration of historic or the destruction of a prehistoric or archaeological site?; b) Will the proposal result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?; c) Does the proposal have the potential to cause a physical change which would effect unique ethnic cultural values?; d) Will the proposal restrict existing religious or sacred uses within the potential impact area?

a., b., c., d. According to the San Ysidro Redevelopment Plan FEIR, there are no known historical, cultural, or archaeological resources associated with this site. The proposed project site is at an area that has been surficially altered to a considerable degree by past construction and dumping activities. While the project is not expected to have a significant impact on cultural resources, it is stipulated in the FEIR that an archaeologist be retained during initial ground disturbance activities to determine whether any such resources exist at the site.

The project site is underlain by the Pleistocene age Bay Point Formation, consisting of marine and nonmarine sandstone that is pale brown, fine- to medium-grained, and poorly consolidated. The marine part of the Bay Point Formation is fossiliferous and interfingers with nonmarine unfossiliferous sandstone. It is stipulated in the FEIR that a paleontologist be retained during initial ground disturbance activities to determine whether any paleontological resources exist at the site.

21. MANDATORY FINDINGS OF SIGNIFICANCE. a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?; b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impact will endure well into the future.); c) Does the project have impacts which are individually limited, but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, however the effect of the total of those impacts on the environment is significant.); d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

a., b., c., d. The following conclusions are reached with respect to the above considerations:

- On the basis of the foregoing explanations, the proposed project will not degrade the quality of the natural environment.
- The proposed project will implement several long-term goals stipulated in Section 3.1 of the San Ysidro Redevelopment Plan FEIR. Short-term project effects would

a., b., c., d., e., f. It is stated in the San Ysidro Redevelopment Project FEIR that significant effects to public services from projects anticipated within the Redevelopment Area are not anticipated. Since the proposed project is consistent with the Redevelopment Plan, it follows that the project would not result in significant public service effects.

15. ENERGY. Will the proposal result in: a) Use of substantial amounts of fuel or energy; b) Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy?

a., b. The project design will be subject to the State Energy Conservation Standards for New Residential and Non-Residential Buildings (Title 24, Part 6, Article 2, California Administrative Code). These standards prescribe mandatory maximum energy consumption levels for new buildings and are enforceable by law. Because the project must comply with these standards, it can be concluded that the energy consumed will be within permissible levels established by public policy, and, therefore, not be environmentally detrimental.

16. UTILITIES. Will the proposal result in a need for new systems or substantial alterations to the following utilities: a) Power or natural gas?; b) Communications systems?; c) Water?; d) Sewer or septic tanks?; e) Storm water drainage?; f) Solid waste disposal?

a., b., c., d., and e. It is stated in the San Ysidro Redevelopment Project FEIR that significant effects to power, natural gas, communications, water, sewer and storm sewer utilities from projects anticipated within the Redevelopment Area are not anticipated. Since the proposed project is consistent with the Redevelopment Plan, it follows that the project would not result in significant effects to the aforementioned utility systems.

f. According to the Redevelopment Plan FEIR, retail/commercial development projects would exceed the City's (Environmental Services Department) impact significance threshold for solid waste disposal. According to the FEIR, applicants for such projects must prepare a Waste Management Plan in coordination with City staff. Such a study has been prepared by Parsons Transportation Group and is available for review upon request.

17. HUMAN HEALTH. Will the proposal result in: a) Creation of any health hazard or potential health hazard (excluding mental health)?; b) Exposure of people to potential health hazards?

a., b. Although accidents may be expected in conjunction with almost any land use, based on information provided, there are no anticipated design or operational characteristics associated with the project that might be considered health hazards.

To avoid significant impacts associated with the accidental release of a hazardous substance, the project would be designed, constructed, and operated in accordance with the following regulations: OSHA Title 29 CFR, Cal/OSHA Title 8 CCR, UFC, and UBC.

18. AESTHETICS. Will the proposed project result in the obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?

With the exception of a few private residences, businesses, and a federal government facility, the proposed project site consists of disturbed, vacant land. The undulating terrain provides evidence of considerable past dumping activity. The proposed development will be reviewed by City staff for its adherence to applicable architectural and landscape design standards. There will be no obstruction of any existing view corridors or scenic views from surrounding areas. Given these considerations, aesthetic impacts associated with the proposed project will

Table 1

INTERNATIONAL GATEWAY OF THE AMERICAS PROJECT
Planned Gross Square Feet

Land Use	Development Parcel							TOTAL
	A	B	C	D	E	F	G	
Auto Retail	15,000							15,000
Retail	79,000	40,000			22,500			141,500
Department Store	80,000							80,000
Theater(2600 seats)	60,000							60,000
Restaurant	4,000							4,000
Food Court	5,000							5,000
Factory Outlet		50,000	200,500					250,500
Convenience/Food		4,000	10,000					14,000
Auto Service		4,000						4,000
Federal Inspection Office					45,000			45,000
Hotel/Conference Cntr. (300 rms)					122,500			122,500
University/ Cultural Center (Grad. Study)					250,000			250,000
					50,000			50,000
TOTAL	243,000	98,000	210,500	0	490,000	0	0	1,041,500

Completion Date 6/99 1/02 11/99 1/00 6/03 1/01 1/00

- Development Parcel A - American Retail and Entertainment Group
- Development Parcel B - Factory Outlet 2001
- Development Parcel C - Factory Outlet Mall
- Development Parcel D - Multi Modal Transit Center
- Development Parcel E - Plaza de Americas
- Development Parcel F - Trolley Terminus and Garage (2,000 parking spaces)
- Development Parcel G - Pedestrian Bridge

290105

Table 2
MITIGATED LEVELS OF SERVICE

SIGNALIZED INTERSECTIONS						
Intersection	Non-Project		With-Project		Mitigated	
	LOS ²	ICU ¹	ICU	LOS	ICU	LOS
Camino de la Plaza @ I-5 SB On-/Off-ramps	0.55	B	1.25	F	0.85	D
East Beyer Boulevard @ East San Ysidro Boulevard	0.36	B	0.77	D		
East San Ysidro Boulevard @ I-5 NB On-/Off-ramps	0.86	E	1.33	F	0.79	D
East San Ysidro Boulevard @ Via de San Ysidro	0.72	D	0.74	D		
San Ysidro Boulevard @ Dairy Mart Road	0.58	B	0.61	C		
Camino de la Plaza @ Willow Road	0.45	B	0.67	C		
Via de San Ysidro @ I-5 SB Off-ramp/Calle Primera Road	1.05	F	1.20	F	0.79	D
Via de San Ysidro @ I-5 NB On-/Off-ramps	0.63	C	0.71	D		
Dairy Mart Road @ I-5 SB On-/Off-ramps	0.75	D	0.96	E	0.83	D
UNSIGNALIZED INTERSECTIONS						
Intersection	Non-Project		With-Project		Mitigated	
	Delay ³	LOS	Delay	LOS	Delay	LOS
San Ysidro Boulevard @ Smythe Avenue	0.6	A	0.7	A		
Beyer Boulevard @ Otay Mesa Road/East Beyer Boulevard	2.1	A	2.1	A		
San Ysidro Boulevard (east of Dairy Mart Road) @ I-5 NB On-/Off-ramps	1.1	A	0.9	A		
Dairy Mart Road @ Camino de la Plaza	4.0	A	42.2	E	5.9	B
San Ysidro Boulevard @ Sunset Lane	0.8	A	0.8	A		

1 Level of Service

2 Intersection Capacity Utilization

3 Delay in seconds per vehicle estimated; based upon 1994 *Highway Capacity Manual* (HCM) Methodology



San Diego
ASSOCIATION OF
GOVERNMENTS

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April 7, 1998

RECEIVED

APR 13 1998

REDEVELOPMENT AGENCY

Ms. Patricia Highman
Deputy Executive Director
Redevelopment Agency
City of San Diego, MS 3A
202 C Street
San Diego, CA 92101

SUBJECT: Mitigated Negative Declaration for the International Gateway of the Americas

Dear Ms. Highman:

On April 3, 1998, the Executive Committee of SANDAG reviewed the Mitigated Negative Declaration for the International Gateway of the Americas project. Subject to concurrence by the Board of Directors, SANDAG has the following comments on the Mitigated Negative Declaration.

- 1 A discussion of possible contaminated soils in the property where the project is proposed, from Virginia Avenue westward to Willow Road and south of Camino de la Plaza, should be included in the Mitigated Negative Declaration. The 1996 environmental document for the San Ysidro Redevelopment Plan examined locations of tanks in the community for leakage and soil contamination. This property is not listed as one examined, probably because no known storage tanks were on it. However, for about 20 years until 1995, this property was the staging area for commercial trucks crossing into Tijuana. The environmental document should address the testing of these soils and any necessary mitigation from contamination by these commercial trucks
- 2 Traffic impacts from the project on I-5 and I-805 also should be included in the Mitigated Negative Declaration. The only impacts studied in the document's Traffic Impact Analysis were intersection traffic on surface streets and to freeway ramps for the year 2001, the project's projected completion year. Although the earlier environmental document for the Redevelopment Plan stated traffic projections for the freeways, impacts from this specific project were not analyzed for possible mitigation. The Gateway of the Americas project's Mitigated Negative Declaration should include the impacts by vehicular traffic on the freeways, given the federal border inspection requirements and necessary delays caused by them. It should include, also, the project traffic impacts following the completion date of 2001, such as 2005, 2010, and/or 2015.

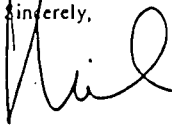
Response to comments from San Diego Association of Governments signed by Michael McLaughlin, Director of Land Use and Public Facilities Planning, dated 04/07/98.

- 1 The "Final Environmental Impact Report for the proposed San Ysidro Redevelopment Plan, SCH No. 95-101015", adopted by the Redevelopment Agency of the City of San Diego fully addressed the issue of potentially contaminated soils. As discussed in Section 4.11 of that document, a Preliminary Site Assessment for the San Ysidro Redevelopment Area was undertaken to assess the probability of hazardous materials within the redevelopment area. No potential sites were located on the Gateway project site. The closest identified site was an underground storage tank on the K-Mart site north of Camino de la Plaza which has already been removed. Although there is no reason to believe there are any contaminated soils on-site. In the event any are discovered through the course of project design and construction they will be properly reported and remediated in accordance with federal, state and local requirements.
- 2 Traffic impacts were also addressed in the Final EIR for the Redevelopment Area. The Final EIR utilized the SANDAG Series 8 travel forecast to model traffic flows on the primary streets and freeways (including I-5 and I-805) in the project area for the year 2015. The traffic analysis completed for the Mitigated Negative Declaration (MND) was done for the year 2001 to identify short term incremental impacts associated with the development of the Gateway project prior to completion of the San Ysidro Community Circulation Plan. This traffic study identified mitigation measures including street improvements, traffic signal installations and freeway interchange modifications.

The project is proposing to construct a pedestrian bridge across the Tijuana River and a convenient connection between the project site and the proposed Tijuana Tren Ligero (Light Train) project. Both of these aspects of the project will provide an attractive alternative to the automobile for daily border crossers. Additionally the project proponent, LandGrant Development has offered to make available additional right of way to widen the existing San Ysidro Port of Entry to better accommodate the needs of the federal inspection services. Based on this offer Rudy Camacho of the U.S. Customs Service is supporting the project and the reopening of the Virginia Ave. Port of Entry for pedestrian purposes.

Thank you for your attendance at the meeting. A copy of the Executive Committee report is attached. If you have any questions about the comments, or SANDAG's review procedures, please call me at (619) 595-5373 or Nan Valerio at (619) 595-5365.

Sincerely,



MICHAEL McLAUGHLIN
Director of Land Use and Public Facilities Planning

MM/NV/cc

Attachment

P-290105

April 3, 1998

INTERNATIONAL GATEWAY OF THE AMERICAS PROJECT
MITIGATED NEGATIVE DECLARATION

Introduction

The City of San Diego has issued a Mitigated Negative Declaration for a project called the Gateway of the Americas, in the redevelopment district of San Ysidro. The project proposes retail, office, hotel/conference center, and other uses on property west of I-5 and the San Ysidro border crossing. The proposed project is in compliance with the adopted community plan for San Ysidro. Comments on the environmental document are due April 10, 1998. A map of the project is attached.

Mitigated Negative Declaration

The Mitigated Negative Declaration, the environmental document for the project, has been distributed by the City of San Diego for comment. This environmental document finds that the proposed project will not have a significant impact on the environment and, therefore, an Environmental Impact Report is unnecessary. Where an impact has been found, the environmental document proposes mitigation measures to alleviate the impact.

Only two areas were found to have a substantial impact: noise and local traffic circulation. Noise would be mitigated through a number of measures, including sound walls, muffling construction equipment and restricting the hours of its operation, and restricting hours of truck deliveries to businesses, among others. Traffic circulation impacts would be mitigated through additional traffic signalization and improvements to various intersections.

It is my RECOMMENDATION

that SANDAG, subject to concurrence by the Board of Directors, submit the following comments on the Mitigated Negative Declaration for the Gateway of the Americas project to the City of San Diego.

A discussion of possible contaminated soils in the property where the project is proposed, from Virginia Avenue westward to Willow Road and south of Camino de la Plaza, should be included in the Mitigated Negative Declaration. The 1996 environmental document for the San Ysidro Redevelopment Plan examined locations of tanks in the community for leakage and soil contamination. This property is not listed as one examined, probably because no known storage tanks were on it. However, for about 20 years, until 1995, this property and its unpaved roadway, Tia Juana Street, was the staging area for commercial trucks crossing into Tijuana. The environmental document should address the testing of these soils and any necessary mitigation from contamination by these commercial trucks.

Traffic impacts from the project on I-5 and I-805 also should be included in the Mitigated Negative Declaration. The only impacts studied in the document's Traffic Impact Analysis were intersection traffic on surface streets and to freeway ramps for the year 2001, the project's projected completion year. Although the earlier environmental document for the Redevelopment Plan stated traffic projections for the freeways, impacts from this specific project were not analyzed for possible mitigation. The Gateway of the Americas project's Mitigated Negative Declaration should include the impacts by vehicular traffic on the freeways, given the federal border inspection requirements and necessary delays caused by them. It should include, also, the project traffic impacts following the completion date of 2001, such as 2005, 2010, and/or 2015.

Discussion

- 3 The Gateway of the Americas development would extend along the northern levee of the Tijuana River, from the eastern edge of Virginia Avenue westward to Dairy Mart Road and south of Camino de la Plaza in the San Ysidro community of the City of San Diego. The focal point of the development is a proposed "gateway" plaza that would include pedestrian access between Tijuana and San Ysidro.

The project, when fully developed, would include an entertainment/movie complex at its western edge, factory outlet stores in the central area, and a hotel/convention center and offices at the eastern portion. The project proposes that the San Diego Trolley terminus be moved to the site, with the trolley elevated over I-5 and the terminal to be part of the parking complex. The project has the support of the San Ysidro community and the City of San Diego Planning Commission.

One of the components of the Gateway of the Americas proposal is the pedestrian access between Tijuana and the project. The adopted San Ysidro Community Plan supports only pedestrian access at the Virginia Avenue crossing, with no vehicular crossing. The GSA report, discussed below, notes that the pedestrian facilities at San Ysidro are at 25% of capacity and projected, by 2015, to be at 50% of capacity and does not recommend a pedestrian crossing at Virginia Avenue. Pedestrian access at Virginia Avenue would require the approval of the federal governments of both countries and may be subject to federal environmental regulations.

Related Activities

1. Cities of San Diego and Tijuana Joint Plan

- 4 The City of San Diego and the Municipality of Tijuana, under their 1996 Binational Cooperation agreement, are proposing to prepare a joint land use and transportation plan for their border area, extending from the ocean inland to the eastern urban boundaries of Tijuana, at approximately Otay Mountain in San Diego. The northern and southern boundaries are not established, but probably would be about 3 kilometers on each side of the border. This effort is under review by the respective staff in the two cities for presentation to the elected bodies. SANDAG has been asked to assist the project with Geographic Information System (GIS) work and traffic analysis.

2. Virginia Avenue

The Gateway of the Americas project proposes to acquire the federally owned property at Virginia Avenue, now housing government offices. The General Services Administration (GSA) released a

- 3 The "discussion" section of the letter does not pertain to the adequacy of the MND and no response is necessary.
- 4 Comment noted. The discussion under "related activities" provides facts about U.S.-Mexican border crossing issues at San Ysidro.

290105

report on March 28 discussing the use of Virginia Avenue for southbound vehicular access into Tijuana and converting existing southbound lanes at San Ysidro into northbound ones. The Mexican federal government and the State of Baja California first proposed this use as a means of resolving northbound and southbound traffic congestion in Tijuana. The GSA report states that such use is feasible and proposes facilities that could accommodate the inspection requirements of both governments. The GSA report was prepared in cooperation with the federal inspection services and received their support for facility improvements using Virginia Avenue.

The GSA report builds on a study completed by SANDAG in June 1996 that showed the use of Virginia Avenue was feasible for the southbound freeway entrance into Tijuana. SANDAG's consultant determined that daily traffic on I-5 at the border would increase from about 95,000 vehicles a day in 1995 to about 123,000 per day in 2015. Without additional lanes, delays entering the U.S.A. would increase about 20 to 30 minutes over current times. The Municipality of Tijuana Planning Department reports that, without improvements to the facilities, it projects "gridlock" at the San Ysidro-Puerta Mexico gate in 2013.

3. Ports of Entry Council

The Consul General of the United States, in Tijuana, and the Consul General of Mexico, in San Diego, jointly established a Ports of Entry Council to provide a legal means by which the federal, state, and local governments could communicate and help resolve local issues concerning the border facilities.

The federal inspection services of the U.S. Section of the Council met and discussed the proposed development and alternatives to resolving the traffic congestion at the San Ysidro-Puerta Mexico gate. As a result of the discussions, the representatives of the federal inspection services wrote to the State Department's office of the International Commission on Bridges and Border Crossings. The letter requested additional study of the San Ysidro gate to determine if that gate could be expanded at its present location to accommodate the additional north- and southbound vehicular traffic.

Summation

There is a desire to improve conditions at the border of San Ysidro and Tijuana, reportedly the busiest land port of entry in the world. In the federal fiscal year ending September 30, 1997, there were 15.3 million vehicles, 8.7 million pedestrians, and a total of 43.3 million persons that crossed northbound at this port of entry.

The City of San Diego and the community of San Ysidro want to improve the area surrounding the border. The federal inspection services are interested in facility improvements at the border because of increased traffic and new federal guidelines (beginning this fall) that will require the inspection of southbound vehicles leaving the U.S. However, there is no consensus among local authorities and the federal agencies as to the one best solution for both vehicular traffic and development.



KENNETH E. SULZER
Executive Director



Good Neighbors

San Diego
Housing Commission

• 650 Gateway Center Way, Suite D
• San Diego, California 92102
• 619/525 3716
• Fax 619/527 0354

RECEIVED

APR 14 1998

REDEVELOPMENT AGENCY

To: Patricia Hightman
Deputy Executive Director
Redevelopment Agency of San Diego
MS 3A

From: Patricia Zamora *PZ*
Housing Programs Manager

Date: April 6, 1998

SUBJECT: International Gateway of the Americas Project
Mitigated Negative Declaration

Staff has reviewed the CEQA Initial Study and Mitigated Negative Declaration regarding the proposed International Gateway of the Americas Project, located in the community of San Ysidro.

5 The only impact the Housing Commission anticipates is the increased vehicle traffic in the community.

We wish you well, and look forward to the future economic benefits this project will provide to the community we serve.

Response to comments from San Diego Housing Commission signed by Patricia Zamora, Housing Programs Manager, dated 04/06/98.

5 Comment noted. Impacts associated with increased vehicular traffic are assessed in the MND.

CITY OF SAN DIEGO
MEMORANDUM

TO: Paul Hellman, Environmental Analysis Section
FROM: Ali Sabouri, Transportation Development Section
DATE: March 23, 1998
SUBJECT: International Gateway Of the Americas Project
Mitigated Negative Declaration

We have the following comment to the Transportation/Circulation section of the subject document:

1. City of San Diego Trip Generation Manual should be used to determine the project's generated traffic.
2. Traffic analysis for this project should be prepared in accordance with the guidelines described in the City of San Diego Traffic Impact Study Manual.
3. The scope of the traffic analysis should be based on guidelines provided in the City of San Diego Traffic Impact Study Manual.
4. Traffic analysis should provide intersections and roadway segment and freeway segment analysis for both AM and PM peak hours under the following scenarios:
 - A. Existing conditions
 - B. Existing plus other projects condition
 - C. Existing plus other projects plus project conditions
 - D. Buildout without the project
 - E. Buildout with the project
5. Traffic study should provide analysis for project access, parking requirement and internal circulation.
6. Traffic study should provide a detail analysis regarding the pedestrian circulation and public transit area.

Response to comments from City of San Diego Transportation Department, signed by Ali Sabouri, dated 03/23/98

- 6 The San Diego Trip Generation Manual was used. Prior to conducting the traffic study, Parsons Transportation Group met with City staff to discuss protocol for the traffic analysis.
- 7 The traffic impact study was prepared in compliance with the "Traffic Impact Study Manual" (Aug. 1997).
- 8 See response to comment No. 7.
- 9 The MND traffic analysis built from the traffic analysis included in the FEIR, which was a programmatic EIR. The FEIR fully evaluated buildout conditions based on site specific land use assumptions that included more trips than would be generated by the project. Therefore the buildout impacts with the project will be less than previously analyzed.

The MND traffic analysis evaluated existing, existing+other projects and existing+other projects+project scenarios for the PM peak hour at critical intersections surrounding the project. The AM peak hour was not evaluated because the project is primarily commercial in nature and generates only minimal AM peak hour traffic. Similarly segment analysis was not warranted because of the number of intersections evaluated and the fact that the street capacity is controlled by the intersections and not the intervening segments.
- 10 Site access is analyzed in Section 6 of the Traffic Impact Analysis prepared by Parsons Transportation Group for this project. It is anticipated that all major driveways will require signalization. In designing Camino de la Plaza, consideration will be made to spacing intersections. At this time, it is anticipated that the project would include approximately 5200 surface and structure parking spaces. This total would be well within the City requirements for a development of this size.

The project would involve the realignment of Tia Juana Street along the southern perimeter of the site. The existing north-south alignment of Virginia Street would be relocated to the eastern site boundary. Willow Road would be retained across the site along its present alignment. Any future trolley extensions would include grade separated crossings both on

290105

and off site.

Internal circulation at the International Gateway project site cannot be fully evaluated at this time as a comprehensive site plan is not available. No significant impacts are anticipated because:

1) Direct access to surrounding perimeter roads would be provided; 2) To the extent feasible, pedestrian traffic would be separated from vehicular traffic; 3) Any future trolley extension would include grade separated crossings.

- 11 See response to Comment 10 above regarding potential pedestrian circulation and public transit safety issues. Further detailed analysis of these topics will be conducted as part of the site planning process.

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

FILE NO.:

DATE: April 2, 1998

TO: Larry Van Wey, Caltrans Coordinator, Traffic Engineering Division

FROM: Ron D'Argento, CIP Section, Traffic Engineering Division

SUBJECT: International Gateway of the Americas - Cost Estimates

Response to comments from City of San Diego, CIP Section, Traffic Engineering Division, signed by Ron D'Argento, dated 04/2/98.

12 Comment noted. This letter pertains to project cost estimate considerations and does not pertain to the MND.

12 As requested, I have reviewed the nine page submittal by Parsons Infrastructure & Technology Group, which contains a summary sheet of projects and individual project estimate sheets for city improvement projects. I also received a copy of *International Gateway of the Americas* brochure and a phasing plan blueline sheet of the project to assist in the estimate review. My comments are as follows:

- 1) The city improvement projects contained in the submittal are not readily identifiable either in the brochure or on the blueline sheet. Therefore, project lengths and scopes are not verifiable.
- 2) The submittal does not include individual project estimate sheets for all the city improvement projects listed on the front summary sheet (Dairy Mart Rd. And traffic signals missing). The description of project limits on the summary and individual sheets are, in some cases, vague and/or confusing and do not correspond to each other.
- 3) The list of line items contained on the individual project estimate sheets appears to be adequate. Since these projects are stated to be developer constructed, the unit prices used can vary significantly from city project unit prices and are therefore, not verifiable by staff. Most of them, however, do appear to be reasonable.

Without some type of preliminary plan with some amount of detail beyond what has been submitted, a more in depth review is not possible.

cc: Allen Holden, Jr.
Paul Toomey

City of San Diego
M E M O R A N D U M


APR 06 1998

Response to comments from the City of San Diego, Traffic Engineering Division, signed by Larry Van Wey, Senior Traffic Engineer, dated 04/06/98

FILE NO: TR 225,634
DATE: April 6, 1998
TO: D. Cruz Gonzalez, Director, Transportation Department
FROM: Larry Van Wey, Senior Traffic Engineer, Traffic Engineering Division
SUBJECT: Comments on International Gateway of the Americas

13 Comment noted. See response to Comment 12 above.

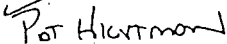
- 13 Ron D'Argento and Paul Toomey reviewed the project summary sheets for the International Gateway of the Americas project. Ron's comments are attached. Paul noted that the plans call for street trees and for street lights which are spaced 150 feet apart. This would require the formation of a Landscape Maintenance District, as the City does not install or maintain street trees, and our standard spacing for street lights is 300 feet. Also attached are Ali Sabouri's comments on the Transportation/Circulation section of the project's Mitigated Negative Declaration.


LARRY VAN WEY

BJ:ml

Attachments

cc: Paul Toomey, Senior Civil Engineer, Traffic Engineering Division
Ron D'Argento, Associate Civil Engineer, Traffic Engineering Division

cc: 
Pot Hiertman

Pot File



DEPARTMENT OF THE TREASURY

U.S. CUSTOMS SERVICE

INDIANAPOLIS, INDIANA

April 9, 1998

RECEIVED

APR 14 1998

REDEVELOPMENT AGENCY

Response to comments from Department of the Treasury, US Customs Service, signed by Gary Ragatz, Border Team Leader, dated 04/09/98

Ms. Patricia Hightman
Deputy Executive Director
Redevelopment Agency
202 C Street, 3rd Floor, MS 3A
San Diego, California 92101-3863

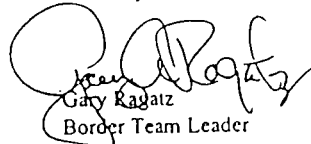
Dear Ms. Hightman:

We are in receipt of your Mitigated Negative Declaration prepared by the City of San Diego for the International Gateway of the Americas Project. Per your request our comments are as follows:

- 14 1. The General Services Administration is our land lord and is responsible for preparing all documentation for our proposed projects. We rely on their expertise in respect to projects in the areas around the border stations.
- 15 2. Before this plan moves forward, an agreement between all Federal Inspection Agencies, Private owners, City of San Diego, and the Government of Mexico needs to be reached. Evaluation of all proposed plans needs to be made and where the plans differ, consensus and consolidation of the plans needs to be made. Until such time as this consensus is reached there should not be any purchase of sale of properties included in the proposals.

We appreciate the opportunity to provide comments on this declaration and look forward to continued communications on this subject.

Sincerely,


Gary Ragatz
Border Team Leader

cc: Southern California CMC
Nerisa de Jesus
Portfolio Management
450 Golden Gate Avenue
San Francisco, California 94102-3400

14 Comment noted. This is an informational response.

15 Comment noted. As part of the property acquisition, site development and border crossing components of this project, the Redevelopment Agency of the City of San Diego will comply with all laws and regulations, including the National Environmental Policy Act (NEPA). Appropriate coordination with responsible agencies will be conducted.



General Services Administration, Region 9
Phillip Burton Federal Building and U.S. Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102-3400

APR 10 1998

Patricia Hightman
Deputy Executive Director
Redevelopment Agency of San Diego
202 C Street, 3rd Floor, MS 3A
San Diego, CA 92101-3863

Re: International Gateway of the Americas Project
Mitigated Negative Declaration (the "Report")

Dear Ms. Hightman:

Thank you for giving the United States General Services Administration ("GSA") the opportunity to review and comment on the above-referenced document. We appreciate the effort associated with the preparation of this document.

- 16 As a general comment, we noted that the project contemplates the use of, and directly impacts other, real property currently owned by the United States of America. Thus, we were somewhat surprised that the document was not prepared to comply with the National Environmental Policy Act ("NEPA"). GSA will make no decision with regard to this project before a full NEPA review is conducted.
- 17 This project envisions the continued use of the current San Ysidro Port of Entry for private non-commercial vehicles and the transfer of the pedestrian in-processing facility to the Government's Virginia Street gate. It also would eliminate the current option available to the Government to re-open Virginia Street to vehicles. These changes may be beneficial to the environment, the community and the Government; however, this report lacks sufficient information to properly evaluate the benefits and impacts of this project.
- 18 By way of illustration, the evaluation of the traffic impacts is woefully inadequate. First and foremost, no comprehensive study of the traffic impacts was prepared. The limited information that was provided offered data for the geographic area contiguous to the project site and only to the 2001 level. Given the volume of traffic, it would appear that a more exhaustive study needs to be prepared which examines, at a minimum, the impacts of traffic traveling through the port of entry both in the short term as well as the long term. The existence of the Virginia gate, while not in use now, does provide a viable option for future expansion

Response to comments from General Services Administration, signed by Arlin M. Timberlake, Jr., Director Portfolio Management Division, dated 04/10/98.

- 16 It is concurred that a NEPA document will be required for this project. A separate Environmental Assessment will be prepared at the appropriate time. A NEPA document was not prepared at this time as the scope can not be fully determined until all issues regarding the reopening of the Virginia Avenue Port of Entry and the specific location of the planned pedestrian bridge across the Tijuana River are determined.
- 17 Comment noted. Beneficial impacts from the project are not required to be discussed in documents prepared under the California Environmental Quality Act. The Binational Ports of Entry Council, which includes GSA, U. S. Treasury, INS and the U.S. Attorney, has evaluated various alternatives and concurs with the project proposal to reopen the Virginia Avenue Port of Entry as a pedestrian only gate.
- 18 Please refer to response to Comment 2 above, which in part, states that a long-range traffic analysis was prepared in the San Ysidro Redevelopment Plan EIR. The proposed project would reduce the dependence on automobile crossings due to improved pedestrian access to primary tourist commercial areas both north and south of the border. Given this consideration, the project would be expected to have a beneficial effect on border crossing traffic.
- Comment noted regarding a potential future use of the Virginia Avenue crossing for vehicular purposes. It is noted that this issue has been discussed at the Binational Ports of Entry Council which GSA, U.S. Customs, the U.S. Attorney's office, INS and their Mexican counterparts are members. This council, in March 1998, agreed that a pedestrian-only entry at Virginia Avenue was appropriate [and as such, sent their] conclusion to the Binational Bridges and Border Crossings Group.

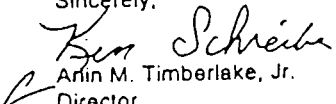
needs. We would be reluctant to give up that flexibility, unless it were demonstrated that this project is beneficial to the Government.

19 Moreover, this comprehensive traffic study is needed so that an adequate air quality evaluation can be prepared. The report identifies a benefit to air quality at the Virginia gate, but unfortunately, neglects to evaluate the impact at the San Ysidro Port of Entry. As you know, the traffic delays at San Ysidro can be considerable even at present. The length of time a vehicles idles in traffic directly affects the air quality. A more comprehensive analysis of this impact needs to be prepared.

20 In closing, we appreciate being given the opportunity to review this document. However, we find it difficult to conclude that a Mitigated Negative Declaration is appropriate when there appear to be issues which require further study. We urge that these issues be addressed before you move forward with this project.

We look forward to continued discussions with your office about this project. If you have any questions about this matter, please do not hesitate to contact me, or Ms. Nerisa de Jesus of my staff at (415)522-3477.

Sincerely,


Arin M. Timberlake, Jr.
Director
Portfolio Management Division

19 See response to Comment 18. Since automobile traffic impacts at the border crossing would not be exacerbated with this project, air quality conditions with the project were adequately evaluated in the San Ysidro Redevelopment Plan EIR.

20 Comment noted. The CEQA process provides for limited supplemental studies to follow a programmatic EIR. These supplemental analyses can take the form of an MND provided all adverse environmental impacts are mitigated to a level of insignificance as is the case with this project.

R-290105

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, P.O. BOX 85406, MAIL STATION 66, SAN DIEGO, 92186-6406
619 688 6424 TOLL NUMBER
619 688 6834

April 9, 1998

Ms. Patricia Hightman
Deputy Executive Director
City of San Diego
Redevelopment Agency
City Administration Building, MS 3A
202 "C" Street
San Diego, CA 92101-3863

Dear Ms. Hightman:

Mitigated Negative Declaration and Initial Study for the Proposed
International Gateway of the Americas Project

The Department appreciates the opportunity to review and comment on the Mitigated Negative Declaration and Initial Study for the proposed project. However, we do not have adequate information to evaluate the impacts to State facilities or improvements required as mitigation for the project. Based on the information provided, we have the following specific comments.

- 21 • Any changes to the Interstate Highway System, including ramps and overcrossings, will require federal environmental documentation, appropriate detailed engineering studies, and encroachment permits.
- 22 • A Project Study Report (engineering feasibility study) prepared by the project proponents will be required if highway improvements are extensive.
- 23 • All highway improvements will have to meet current Interstate Highway Standards.
- 24 • A 20-year traffic study providing traffic volume projections for a.m. and p.m. peak periods will be necessary to adequately determine traffic impacts and required mitigation to State facilities. All Caltrans signalized intersections (including those proposed for future signalization) should be analyzed with the Intersecting Lane Vehicle (ILV) method, per topic 406 of the Highway Design Manual. All Caltrans unsignalized intersections will need a full signal warrant study using Caltrans methodology, with no assumption that signals will be installed by others.
- 25 • The Project Traffic Study provided (pages 9 and 26) assumes that Camino de la Plaza will be improved to four lanes and extended to Dairy Mart Road with completion of another development. This would also seem to be a necessary mitigation for the Gateway project, if not accomplished otherwise.

Response to comments from California Department of Transportation.,
signed by Bill Figge, Chief Planning Cities Branch, dated 04/09/98

- 21 It is concurred that any changes will require federal environmental documentation, and appropriate studies and permits.
- 22 It is concurred that a Project Study Report/Project Report will be required if improvements exceed \$1,000,000 within Caltrans right of way per the Caltrans "Project Development Manual".
- 23 It is agreed that all highway improvements must be designed to meet current Interstate Highway Standards.
- 24 See response to Comment 2 and 9. Traffic signal warrant analyses were completed (appendix C) and an ILV analysis will be completed as part of the Project Study Report noted in response to comment 22.
- 25 Improvement of this segment of Camino de la Plaza is proposed as a mitigation measure for project traffic impacts. A cost-sharing option for the referenced segment of Camino de la Plaza has already been consummated.

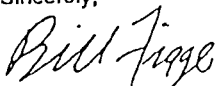
- 26 • The Project Traffic Study also assumes that some currently unsignalized intersections will be signalized by others (i.e. Dairy Mart/SB I-5 ramps.) This would also seem to be a necessary mitigation for the Gateway project, if not accomplished otherwise.
- 27 • The existing traffic volumes, as shown on Figure 4 of the Project Traffic Study, are too low and should be revised. Also, the Existing Level of Service for the San Ysidro Boulevard/ I-5 northbound on/off-ramps, as shown on Table 3, should be revised.
- 28 • Any mitigation resulting from this development would have to come from non-State Highway funding sources; therefore, funding would be the responsibility of the project proponents.

29 We have recently reviewed the General Services Administration's (GSA) "Virginia Avenue Border Crossing Feasibility Study". The Gateway proposal and the results of the GSA Study appear to be inconsistent. The GSA conclusions and recommendations are attached for your information.

The Department supports the recommendation for close coordination with all responsible agencies and appreciates the opportunity to participate in the process. Early consultation and continuous coordination with the Department is strongly encouraged.

If you have any questions, please contact me at (619) 688-6954 or Gene Pound at (619) 688-6460.

Sincerely,



BILL FIGGE, Chief
Planning Studies Branch

Attachment

- 26 It is concurred that signalization at the subject intersections is necessary mitigation for the Coral Gate and Gateway projects. The installation will be a requirement of the first project completed.
- 27 The traffic counts included in the analysis were taken in February, 1998 at a time agreed to by the City of San Diego. Level of Service was calculated based on the City of San Diego's "Traffic Impact Study Manual".
- 28 Comment noted.
- 29 Comment noted. See response to Comment 18.

R-290105



THE LAW OFFICES OF
WORDEN, WILLIAMS, RICHMOND & ELLIS

107 STEVENS AVENUE
SUITE 702
SOLANA BEACH, CA 92075
VOICE 919 755 8404
FAX 919 755 5198

Response to comments from Worden, Williams, Richmond and Ellis,
signed by James H. Ellis, III, dated 04/10/98.

RECEIVED

APR 13 1998

REDEVELOPMENT AGENCY

April 10, 1998

VIA TELEFAX AND U. S. MAIL

Patricia Hightman, Deputy Executive Director
City of San Diego Redevelopment Agency
202 C Street, 3rd Floor
San Diego, California 92101-3863

Re: International Gateway of the Americas Project Mitigated Negative Declaration

Dear Pat:

As you know, our firm represents Baja-Mex Insurance Services, Inc., which owns several Mexican insurance and money exchange operations in San Ysidro and within what appears to be the International Gateway of the Americas Project (hereinafter "Gateway Project") area. We are in receipt of the Proposed Mitigated Negative Declaration, dated March 11, 1998. This letter will summarize the various issues we have been able to ascertain to date concerning the Mitigated Negative Declaration on behalf of Baja-Mex.

30 Neither our client nor our firm was provided a copy of the Mitigated Negative Declaration until late last week. Further, we did not obtain a copy of the Redevelopment Plan FEIR or the Traffic Analysis for the Gateway Project until yesterday. Although we have done our best to review the documents on an expedited basis to comply with the April 10, 1998 comment deadline, we hope that you will extend the comment period to allow us more time for a thorough review of the documents.

1. SCOPE OF THE PROJECT: PRIOR REDEVELOPMENT PLAN FEIR

31 The finding that the Gateway Project is consistent with the Redevelopment Plan and with the Redevelopment Plan FEIR appears to lack factual support. As is discussed below in more detail, the overall thrust of the Gateway Project appears to be much different than the redevelopment activities contemplated by the Redevelopment Plan. A main objective of the Gateway Project is to draw Tijuana residents to the Gateway Project facilities and other commercial areas of San Ysidro and also to provide a more direct access from the U.S. to the downtown commercial area of Tijuana. Neither the Redevelopment Plan nor the FEIR appears to address these aspects of the Gateway Project, which may actually conflict with the Redevelopment Plan policies that call for the balancing of the needs of the potential new development and existing development permitted to remain. In addition, the nature and scope of the land uses in the Gateway Project are significantly different than what is contained in the Redevelopment Plan.

30 Pursuant to state law, the MND was circulated to over 80 agencies and organizations for a 30-day state and local public review period. The availability of the MND was noticed in the San Diego Daily Transcript and the San Diego Union Tribune. A notice regarding the availability of the MND was also posted at the San Diego County Clerk's Office. Given these considerations, the Redevelopment Agency believes that adequate public notice was provided and additional opportunity for public review is not warranted.

31 The proposed bridge across the Tijuana River would encourage enhanced pedestrian access to the site and other portions of San Ysidro. This bridge would be consistent with an implementing measure of the San Ysidro Community Plan, which recommends exploration of a "new pedestrian and bicyclist border crossing at Virginia Avenue." (See Recommendation 3 on page 76 of the San Ysidro Community Plan).

The project site is designated "Future Tourist Commercial" in the San Ysidro Community Plan. This designation includes uses in the following categories: professional office, tourist-oriented commercial, heavy commercial development and tourist parking. According to the Community Plan (see p. 82) this planned area would capitalize on the millions of tourists that cross the border through San Ysidro every year and provide a buffer between the tourist oriented uses of this district and the residential and community oriented commercial portion of the community.

Ms. Patricia Highman
April 10, 1998
Page 2

The Final San Ysidro Redevelopment Plan dated April 16, 1996 states that:

32 "the "Land Use Map" attached hereto as Attachment No. 4 and incorporated herein by reference, sets forth the proposed public rights of way and land uses to be permitted in the Project Area." (Section 500.1)

The Land Use Map referenced above indicates that the entire area proposed for the Gateway Project is identified as "border." However, the uses permitted by the Redevelopment Plan do not have a category for "border" (Section 500.2). The "border" concept has not been adequately developed. In light of the nature of the Gateway Project it needs to be. In addition, the environmental impacts associated with drawing increased numbers of Tijuana residents to the Project area need to be studied.

33 Finally, a review of the Project Objectives under Section 110.1 lists the objective of promoting San Ysidro's international gateway to attract tourism and border crossing traffic to San Ysidro commercial districts, but does not specifically list the Gateway Project. It does not appear that the Gateway Project or anything of that nature was contemplated during preparation of the Redevelopment Plan. Accordingly, it is necessary to review the scope of the FEIR for the Redevelopment Plan.

The FEIR lists the potential increases in various land uses at page 4.1-11 (Table 4.1-1). The International Gateway of the Americas Project is described as:

34 "development of a largely vacant site for various retail (approximately 574,000 square feet, office (approximately 122,500 square feet), federal inspection (approximately 45,000 square feet), hotel/conference center (approximately 250,000 square feet) and university/cultural center (approximately 50,000 square feet) uses. Rerouting of the San Diego Trolley and other transit vehicles, as well as, improved pedestrian access to Mexico are also included as part of this project."

A comparison of the net increases in uses and the scope of the Gateway Project with the FEIR project description is difficult because the categories are not identical, but it appears that the Gateway Project may significantly exceed the proposed increases in land uses in some categories compared to what was contemplated under the FEIR. In addition, as discussed below, the re-routing of the Trolley does not appear to have been even considered in the Redevelopment Plan or the FEIR. Finally, the establishment of an additional pedestrian crossing does not appear to have been a part of the Redevelopment Plan, nor was the impact of Tijuana residents using the new access opportunity considered. Therefore, the conclusory statement that, "[s]ince the [Gateway Project] is consistent with the Redevelopment Plan, general and cumulative environmental impacts associated with site development were addressed in the FEIR," appears to lack factual support.

32 See response to comment 31. The San Ysidro Redevelopment Plan conforms to the San Diego Progress Guide and General Plan and the San Ysidro Community Plan. As such, the Community Plan designation for the site is applicable to this situation where further definition is not provided in the Redevelopment Plan. The Gateway project is consistent with the land uses allowed by the San Ysidro Community Plan and are also consistent with the land uses assumed in the Redevelopment Plan FEIR. The analysis for the MND assumes traffic from Tijuana residents and addresses the trip reductions associated with Mexican residents walking across the border as opposed to driving.

33 The Redevelopment Agency has been working with LandGrant Development and the Barob Group, Ltd. since 1996 to develop the site as contemplated in the Community and Redevelopment Plans. The San Ysidro Community Plan was originally approved by the City Council in 1990. The FEIR analysis addressed impacts associated with similar development of the subject project.

With the exception of the Trolley extension planned uses for the site are anticipated in the San Ysidro Community and Redevelopment Plans. The mix of uses analyzed in the San Ysidro Redevelopment Plan FEIR is substantially the same as the mix proposed for the International Gateway project.

The environmental process allows evaluation of project alternatives that may or may not be proposed by the project developer. In this case, based on this comment letter and others received relating to the consistency of the trolley extension to the Community Plan, the project applicant, LandGrant Development, has agreed not to include the trolley extension as part of their project. LandGrant has agreed to the request of the City of San Diego Redevelopment Agency, MTDB and the City of Tijuana to continue to discuss regional transportation issues and their potential resolution. The project without the trolley extension will generate more trips but will still generate less trips than the land uses assumed in the FEIR. It can therefore be concluded that based on the inclusion of the mitigation measures provided in the MND (which are also included in the FEIR) no significant adverse environmental impacts will remain.

34 Comment noted. See response to Comment 33 above.



Ms. Patricia Hightman
April 10, 1998
Page 3

2. SAN DIEGO TROLLEY

Page 4.2-7 of the Redevelopment Plan FEIR states that, "[t]he Trolley provides an important service to the San Ysidro Community." and then on page 4.2-13 it states, "[t]he proposed Project will benefit from the existence of the Trolley since a relatively high percentage of Project trips will be able to utilize the Trolley as opposed to City surface streets." The re-routing of the Trolley is not contemplated nor discussed in the Redevelopment Plan FEIR. We also question whether the complete rerouting of the Trolley furthers the Project objective of attracting tourism to the existing San Ysidro commercial districts. Finally, the re-routing of the Trolley may be substantially impacted by the actions of the U. S. Government (see #6, below).

3. AIR QUALITY

3 5 In Section IV(2), air quality impacts are assumed to be insignificant because the Project is consistent with the San Ysidro Redevelopment Plan FEIR. However, as noted above, this may not be true, in which case additional air quality analysis may need to be done.

4 TRAFFIC

Section 500.3 of the Redevelopment Plan states that:

"the street layout in the Project Area, as illustrated on the Land Use Map (Attachment No. 4), shall remain substantially in its existing configuration. Streets and alleys may be widened, altered, realigned, abandoned, depressed, decked, or closed as necessary for proper development of the Project. Additional public streets, rights of way, and easements may be created in the Project Area as needed for development. Any changes in the existing street layout shall be in accordance with the Progress Guide and General Plan, the San Ysidro Community Plan, and the objectives of this Plan."

3 6 The Gateway Project proposes substantial changes the circulation within the Plan area. In Section XIII, year 2001 total with Project level of service indicates that the intersections of Camino de la Plaza at the I-5 southbound on and off ramps is projected to operate at LOSF and the intersections of Dairy Mart Road at I-5 southbound on and off ramps and Dairy Mart Road at Camino de la Plaza are projected to operate at LOSE in 2001 with Project traffic. In addition, the
3 7 Report documents that alterations to present patterns of circulation and movement of people will also result from the proposed vehicular and pedestrian circulation pattern changes at the border crossing. These changes are not analyzed and could result in significant impacts to local businesses. Also, the actions of the U. S. Government could substantially impact vehicular circulation (see #6, below).

35 From a vehicle emissions standpoint, the project as proposed in Table 1 of the Mitigated Negative Declaration would result in substantially fewer average daily trips than anticipated in the FEIR. This determination was made based on the site-specific traffic analysis. Consequently, it follows that regional air quality impacts from project implementation would not be significant.

36 The proposed project would be consistent with Section 500.3 of the Redevelopment Plan. The referenced statement offers considerable latitude to modify street widths and configurations to enable safe and efficient access and egress to new development. Camino de la Plaza and Willow Road are presently the main thoroughfares in the vicinity of the site. This condition will remain unchanged with the project as proposed. While Camino de la Plaza will be widened to its design width as part of this project, its alignment will not be changed.

South of Camino de la Plaza, there is currently no through traffic. Willow Road will be extended across the site to service a realigned Tia Juana Street. Virginia Avenue will also be realigned south of Willow Road. None of these improvements are considered "substantial changes (sic) the circulation within the Plan area" as asserted in the comment.

37 See responses to comments #10 and #18 above regarding comment about proposed vehicular and pedestrian circulation patterns.

WR
WE

Ms. Patricia Hightman
April 10, 1998
Page 4

5. RESIDENCE REMOVAL

In Section XII of the document it indicates that only three residences will be removed as a result of the Project. However, we question whether this includes any residences in Mexico which may also need to be relocated as part of the Project. The document should reflect the Project's reasonably expected impacts, regardless of political borders.

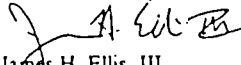
6. FEDERAL ALTERNATIVE

This office has also received a copy of the "Virginia Avenue Border Crossing Feasibility Study" prepared for the General Services Administration of the U.S. Government. This document, which was prepared in March of 1998, proposes to use the existing GSA parcel at Virginia Avenue as a border crossing for southbound vehicular traffic and allows for the existing southbound freeway lanes to be converted to northbound lanes.¹ In addition, it recommends that no new pedestrian crossing at Virginia Avenue be constructed. It appears that the General Services Administration Project would preclude a substantial portion of the Gateway Project. The interrelationship between these two projects must be discussed in the CEQA document currently under review. At minimum, the cumulative impacts must be addressed if both projects go forward, the impacts of precluding the federal project if the Redevelopment Project goes forward, and vice versa, and the growth inducing impacts of either or both projects need to be addressed and if one does not preclude the other, accumulative analysis, especially with regard to air quality and traffic should be undertaken.

At this point, we do not believe the MND is adequate and believe that a full EIR, or focused EIR, may be required. We ask for additional time to review the FEIR on the Redevelopment Plan and to submit additional comments. We presume you have a copy of the GSA Project plans. If not, we will be happy to provide them.

Sincerely,

WORDEN, WILLIAMS, RICHMOND & ELLIS
A Professional Corporation


James H. Ellis, III

FCB/smr
cc: Client
Paul Meyer, Latham and Watkins
Bruce Shepherd, Latham and Watkins
Sam Marasco, LandGrant Development

¹ We note that neither the growth indexing nor the cumulative impact analysis sections of the Redevelopment Plan EIR mention this proposed project.

- 38 The project will not remove any residences in Mexico and due to the limited extent of project development in Mexico no significant impacts are anticipated. Based on the provision for reopening the Virginia Avenue POE for pedestrian use the amount of vehicular traffic in Mexico may even be reduced thus produce a positive effect.
- 39 See response to Comment 18. The characterization of a feasibility study as a "project" is inappropriate. Feasibility studies are exempt from CEQA analysis. Furthermore, the GSA concept, were it to become a project, would be contrary to the City's General Plan, Community Plan, Redevelopment Plan and the proposed plan for the subject site. More importantly if this project is approved and a pedestrian bridge constructed use of the Virginia Avenue POE for vehicular purposes would not occur. In addition since there is no current use of the Virginia Avenue POE, CEQA does not require an analysis of the continued non-use as an impact to the environment. Based on these considerations, the environmental effects of such a concept have not been analyzed herein either individually, cumulatively or from a growth-inducement standpoint.
- 40 Comments noted regarding the adequacy of the Mitigated Negative Declaration. See response to Comment 30 above.

290105

1255 Imperial Avenue, Suite 1000
San Diego, CA 92101-7490
(619) 231-1466
FAX (619) 234-3407

April 10, 1998

CIP 485 (PC 230)

Ms. Patricia Hightman
Deputy Executive Director
City of San Diego Redevelopment Agency
202 C Street, 3rd Floor, MS 3A
San Diego, CA 92101-3863

Dear Ms. ^{Pat}Hightman:

Subject: MTDB COMMENTS ON THE INTERNATIONAL GATEWAY OF THE AMERICAS
MITIGATED NEGATIVE DECLARATION

Following are the San Diego Metropolitan Transit Development Board (MTDB) comments on the subject Mitigated Negative Declaration:

- 41 1. Train Speed - A recommended mitigation measure is that the LRT train speed be maintained at 25 mph or less starting west of the I-5 overcrossing, reducing the noise levels by approximately 5 mph (over a 45 mph train speed). Since no LRT noise impacts were identified in the Noise and Vibration Analysis prepared by Parsons Transportation Group, Parsons Engineering Science, there is no identified reason for reducing train speed. MTDB requests that this mitigation measure be deleted.
- 42 2. Existing Transit Service - On pg. 14 of the Traffic Impact Analysis report, it is stated that trains now operate at 15-minute intervals prior to 8 p.m. on the Blue Line. It should be further stated that during peak periods, trains now operate at 7.5-minute intervals.
- 43 3. Intersection Improvements - It is stated that if the San Ysidro Intermodal Transportation Center (SYITC) project goes forward regardless of the Gateway project, different circulation recommendations at East San Ysidro Boulevard at the I-5 ramps will be implemented as described in BRW's SYITC Traffic and Circulation Study. In reviewing the BRW study, it appears that the forecasted future traffic did not include implementation of the Gateway project. Thus, further analysis is required to determine the traffic impacts (and resultant mitigation measures) with both the SYITC and Gateway projects being implemented.

Please call me at 557-4537 with any questions you may have.

Sincerely,



Bob Robenhymer

L-GATEND.DOC

Response to comments from Metropolitan Transit Development Board, signed by Bob Robenhymer, dated 04/10/98.

- 41 This mitigation was intended to address potential noise impacts to the future hotel use. It is recognized that potential noise impacts could be addressed by either the location or design of the hotel or by modifying LRT speeds. LRT speeds are anticipated to be slowing as a train approaches the multi-modal station. See also response to Comment 33 where the project applicant agreed not to include the trolley extension in their project.
- 42 Comment noted. This modification will not affect the impact analysis. See also response to Comment 33.
- 43 The Gateway project land uses are consistent with the Community Plan and therefore should be included in the assumptions made for the on-going environmental analysis for the SYITC.



SAN YSIDRO
CHAMBER OF COMMERCE

April 1, 1998

Redevelopment Agency
202 C Street, MSA 3A
San Diego, CA 92101-3863
ATTN: Ms. Patricia Hightman

RE: INTERNATIONAL GATEWAY OF THE AMERICAS PROJECT
MITIGATED NEGATIVE DECLARATION

Dear Ms. Hightman

44 After carefully reviewing the proposals for the Gateway of the Americas Project as written in the March 11, 1998 Mitigated Negative Declaration, the rerouting of the San Diego Trolley is found to be inconsistent with the San Ysidro Community Plan

The Gateway project proposes to relocate the Intermodal located on 700 E. San Ysidro Boulevard. Referring to # 6 (p.77) Figure 24 (p. 142) and Figure 28 (p.151) in the San Ysidro Community Plan, specifically states the location of the San Ysidro Trolley Station to be sited on East San Ysidro Boulevard.

The Redevelopment Agency's first priority is to implement the community plan as written. The Agency needs to carefully evaluate all proposals to insure they are consistent with the community plan. Please address the proposal of rerouting the trolley, as it is inconsistent with the plans specifically stated in the San Ysidro Community Plan

It should be in the best interest for the Agency to consider and support what would best serve the WHOLE community.

Sincerely,

Irene Stallard-Rodriguez
President, San Ysidro Chamber of Commerce

cc Congressman Filner's Office
Assemblywoman Ducheny's Office
Senator Peace's Office
Mayor Golding's Office
County Supervisor Cox
Councilman Vargas' Office
MTDB
BTC
Planning Group - Barry Simons
PAC - Doug Perry

Response to comments from San Ysidro Chamber of Commerce, signed by Irene Stallard-Rodriguez, President San Ysidro Chamber of Commerce.

44 See response to Comment 33.

D. Barry Simons
BAROB GROUP, LTD.

1330 Neptune Ave.
Leucadia, CA 92024
(760) 942-3437
Fax (760)943-9541

Response to comments from D. Barry Simons, Barob Group, LTD.,
signed by D. Barry Simons, dated 04/13/98.

45 See response to Comment 33

April 13, 1998

Redevelopment Agency of San Diego
202 C Street, Third Floor
MS 3A
San Diego, CA 92101-3863

Via Fax#(619)236-6512

Attn: Patricia Hightman
Deputy Executive Director

Re: International Gateway of the Americas Project ("Project")
Proposed Mitigated negative Declaration ("Negative Declaration")

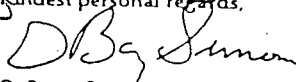
Dear Ms. Hightman:

45 Members of my family and I identified as the "Simons' Interests" in the Exclusive Negotiation Agreement dated July 15, 1997, ("ENA") between your agency and LandGrant Development Unlimited, are the owners of the Core Area described in the ENA and are prospective participants in the Project. In addition to the Core Area, the Simons' Interest own commercial properties on San Ysidro Boulevard which serves as San Ysidro's main commercial artery east of the I-5 freeway and the route of the San Diego Trolley. The Simons' Interests, therefore, have concerns where the Negative Declaration calls for relocation of the trolley line west of the I-5 freeway.

The Negative Declaration includes the "CEQA Initial Study." That study provides that "a key project component is the rerouting of the San Diego Trolley... from San Ysidro Boulevard across Interstate 5 to a planned intermodal transportation facility at the project site."

The physical impact of relocating the trolley in this manner could have substantial adverse social and economic impacts on the San Ysidro community in that it would literally divide the community from a light rail standpoint and divert light rail transportation from the east side of the I-5 freeway. Impact caused by the rerouting of such an important piece of transportation infrastructure, therefore, are so significant as to require either i) further investigation and analysis to support a Negative Declaration or ii) amendment or revision of the Negative Declaration as proposed, indicating that neither the effect of rerouting the trolley nor mitigation thereof have been addressed.

Kindest personal regards,


D. Barry Simons

290105

San Ysidro Project Area Committee
2036 Dairy Mart Rd. #129-128 • San Ysidro, CA 92173
Fax (619) 662-1659
"Gateway to the Americas"

Response to comments from San Ysidro Project Area Committee, signed by Doug Perry, Chairman of the San Ysidro Project Area Committee, dated 04/20/98.

46 See response to Comment 33.

April 20, 1998

City of San Diego
Redevelopment Agency
City Administration Building, MS 3A
202 "C" Street
San Diego, CA 92101
(619) 236-6207

RE: Mitigated Negative Declaration and Initial Study for the Proposed International Gateway of the Americas Project

Ms. Hightman,

4.6 Thank you for the opportunity to review and comment on the Mitigated Negative Declaration and Initial Study for the proposed project. At the Project Area Committee (PAC) special meeting of April 14, 1998, the PAC took action that our comments indicate to the Agency that page 2 of the CEQA Initial Study, which calls for an extension/rerouting of the trolley (by the addition of a new trolley stop), reflects an inconsistency with the San Ysidro Community Plan and would require a community plan amendment. We ask that the Agency address this issue in responding to public comment.

Again, we appreciate your time and effort in presenting this before the PAC and request that our comments be taken into consideration and ask for close coordination between the Agency and the community of San Ysidro.

Respectfully,

Doug Perry
Chairman
San Ysidro Project Area Committee

cc: San Ysidro PAC Members
Lizaa Worthen

COMMUNITY AT WORK

