

000295

REQUEST FOR COUNCIL ACTION
CITY OF SAN DIEGO

1. CERTIFICATE NUMBER
(FOR AUDITOR'S USE) 108
10/23

TO: CITY ATTORNEY

2. FROM (ORIGINATING DEPARTMENT):
POLICE DEPARTMENT

3. DATE:
July 2, 2007

4. SUBJECT:
GANG SUPPRESSION GRANT - 2007 BJA BYRNE DISCRETIONARY GRANT PROGRAM

5. PRIMARY CONTACT (NAME, PHONE & MAIL STA.)

6. SECONDARY CONTACT (NAME, PHONE & MAIL STA.)

7. CHECK BOX IF REPORT TO COUNCIL IS ATTACHED

8. COMPLETE FOR ACCOUNTING PURPOSES

| | | | | |
|----------------|--|--|--|--|
| FUND | | | | |
| DEPT. | | | | |
| ORGANIZATION | | | | |
| OBJECT ACCOUNT | | | | |
| JOB ORDER | | | | |
| C.I.P. NUMBER | | | | |
| AMOUNT | | | | |

9. Additional information / estimated cost:
BJA has solicited proposals for a program to enhance local law enforcement, including local anti-gang programs. SDPD wishes to apply for, and if selected, to accept and expend a grant for \$342,590, or other amount as determined by BJA, for this program. Funds will be used for overtime, equipment and supplies necessary for the program. There is no requirement for matching funds, nor to continue program operations or expenditures after grant funding has been exhausted. SDPD has committed indirect costs as a voluntary match.

10. ROUTING AND APPROVALS

| ROUTE (#) | APPROVING AUTHORITY | APPROVAL SIGNATURE | DATE SIGNED | ROUTE (#) | APPROVING AUTHORITY | APPROVAL SIGNATURE | DATE SIGNED |
|-----------|--------------------------------|------------------------|-------------|-----------|-------------------------|--------------------|-------------|
| 1 | ORIGINATING DEPARTMENT | <i>Yvonne Ronder</i> | 7/16/07 | 8 | CHIEF OPERATING OFFICER | <i>[Signature]</i> | 8-28-07 |
| 2 | ENVIRONMENTAL ANALYSIS | <i>Kenneth Teasley</i> | 7/19/07 | 9 | ORIGINATING DEPARTMENT | <i>[Signature]</i> | 9-28-07 |
| 3 | EOGR | EXEMPT | | 10 | CITY ATTORNEY | <i>May Musc</i> | 9-24-07 |
| 4 | LIAISON OFFICE | <i>[Signature]</i> | 8/8/07 | | | | |
| 5 | FINANCIAL MGMT. | <i>[Signature]</i> | 8/9/07 | | | | |
| 6 | AUDITOR | <i>[Signature]</i> | 08/20/07 | | | | |
| 7 | DEPUTY CHIEF OPERATING OFFICER | <i>[Signature]</i> | 8/28/07 | | | | |

DOCKET COORD: _____ COUNCIL LIAISON: _____
COUNCIL PRESIDENT SPOB CONSENT ADOPTION
 REFER TO: *[Signature]* COUNCIL DATE: *10/23/07*

11. PREPARATION OF: RESOLUTION(S) ORDINANCE(S) AGREEMENT(S) DEED(S)
- Authorize the Mayor or his representative to apply for, accept and expend the grant proposal.
 - Authorize the Auditor and Comptroller to accept, appropriate and expend \$342,590 in grant funds, when the grant is officially authorized by USDOJ/BJA.
 - Authorize the Chief of Police to administer and operate this program.

11A. STAFF RECOMMENDATIONS:
AUTHORIZE THE ACTIONS IN BOX 11.

12. SPECIAL CONDITIONS:

COUNCIL DISTRICT(S): ALL

COMMUNITY AREA(S): ALL

ENVIRONMENTAL IMPACT: This activity is not a "project" and therefore is exempt from CEQA pursuant to the state guidelines section 15060 (c) (2).

HOUSING IMPACT: NONE

OTHER ISSUES: PLEASE SEND A COPY OF THE FINALIZED RESOLUTION TO DONNA WARLICK; MS 704A

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EXECUTIVE SUMMARY SHEET
CITY OF SAN DIEGO

DATE ISSUED: July 3, 2007 REPORT NO:
ATTENTION:
ORIGINATING DEPARTMENT: POLICE DEPARTMENT
SUBJECT: GANG SUPPRESSION – BJA BYRNE 2007
COUNCIL DISTRICT(S): ALL
CONTACT/PHONE NUMBER: DONNA J. WARLICK 531-2221

REQUESTED ACTION:

1. Authorize the Mayor or his representative to apply for, accept and expend the grant proposal.
2. Authorize the Auditor and Comptroller to accept, appropriate and expend \$374,907 in grant funds, when the grant is officially authorized by USDOJ/BJA.
3. Authorize the Chief of Police to administer and operate this program.

STAFF RECOMMENDATION: Authorize the requested actions.

EXECUTIVE SUMMARY: The U.S. Department of Justice (USDOJ), Bureau of Justice Assistance (BJA), under the 2007 Edward Byrne Memorial Discretionary Grant Program, has published a solicitation for Enhancing Local Law Enforcement, including local anti-gang programs.

The San Diego Police Department has designed a project with the following goal: “To Conduct An Intensive, Multi-Faceted Project, Targeting Identified Communities, Gangs And Individuals, That Will Reduce Or Eliminate Criminal Street Gang Activities In Targeted Areas Throughout The San Diego Community.” The project has developed a comprehensive, flexible, adaptable menu of objectives, tactics and strategies. The project will remove violent gang members from target neighborhoods through investigations, arrests and prosecutions. It will disrupt existing gang structures and activities in order to inhibit unlawful and intimidating activities; and conduct follow-up patrols to prevent gangs from re-establishing their activities or displacing to new locations once areas have been cleared. The project will be managed jointly by the commanders of the SDPD Gangs and Narcotics Units.

SDPD requests \$342,590 in funds, primarily for overtime to conduct the various strategies; for state-of-the-art surveillance, entry and safety equipment; and vehicles necessary to conduct effective undercover operations. SDPD will contribute indirect costs as voluntary match.

FISCAL CONSIDERATIONS: None. There is no cash match requirement, and no requirement to continue grant activities or expenditures after grant funds are exhausted.

PREVIOUS COUNCIL and/or COMMITTEE ACTION: NA

COMMUNITY PARTICIPATION AND PUBLIC OUTREACH EFFORTS: NA

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KEY STAKEHOLDERS AND PROJECTED IMPACTS: NA



William M. Lansdowne
Chief of Police
Originating Department



Jill Olen
Deputy Chief Operating Officer
Public Safety/Homeland Security

RESOLUTION NUMBER R-_____

DATE OF FINAL PASSAGE _____

WHEREAS, the U.S. Department of Justice (DOJ), Office of Community Oriented Policing Services (COPS), has solicited proposals for programs to combat violent crime and gangs; and

WHEREAS, City of San Diego Police Department (SDPD) wishes to apply for, accept and expend grant funds for the proposed program under this solicitation; and

WHEREAS, SDPD has designed a program with the goal "To Conduct An Intensive, Multi-Faceted Project, Targeting Identified Communities, Gangs And Individual, That Will Reduce Or Eliminate Criminal Street Gant Activities In Targeted Areas Throughout The San Diego Community; and

WHEREAS, SDPD is requesting \$342,590 in grant funding for overtime to engage in strategies to disrupt existing gang strategies; for surveillance, entry and safety equipment and vehicles; and

WHEREAS, SDPD will contribute \$102,777 in indirect costs as a voluntarily match;
NOW THEREFORE,

BE IT RESOLVED, by the Council of the City of San Diego, that the Mayor or his designee, including the Chief of Police be, and is hereby authorized and empowered, for and on behalf of the City of San Diego, to submit an application for, accept, expend and manage the grant funds and program for the purposes stated in the attached application.

BE IT FURTHER RESOLVED, that this authority includes the execution of all aspects of fund and program operation, including any amendments, extensions, augmentations, or

renewals from the U.S. Department of Justice for identical or closely related purposes; and to certify that the City will comply with all applicable statutory or regulatory requirements.

BE IT FURTHER RESOLVED, that the Auditor and Comptroller are authorized to accept, appropriate and expend these funds if grant funding is secured.

BE IT FURTHER RESOLVED, that this authorization shall be valid for a period of up to five years, provided funding for this purpose is made available by the U.S. Department of Justice

BE IT FURTHER RESOLVED, that any resources received hereunder shall be used to supplement and not to supplant expenditures controlled by this body.

APPROVED: MICHAEL J. AGUIRRE, City Attorney

By Mary T. Nuesca
Mary T. Nuesca
Deputy City Attorney

MTN:lb
09/17/2007
Or.Dept: Police
R-2008-229

I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of _____.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved: _____
(date)

JERRY SANDERS, Mayor

Vetoed: _____
(date)

JERRY SANDERS, Mayor

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CITY CLERK COPY
DO NOT KEEP

THE CITY OF SAN DIEGO POLICE DEPARTMENT - CA03711

EDWARD BYRNE MEMORIAL DISCRETIONARY GRANTS PROGRAM

FY 2007 COMPETITIVE GRANT APPLICATION

Category III: Enhancing Local Law Enforcement Through Gang Suppression

ATTACHMENT 1 – ABSTRACT AND PROGRAM NARRATIVE



ABSTRACT: The San Diego Police Department has designed a project with the following goal: "To Conduct An Intensive, Multi-Faceted Project, Targeting Identified Communities, Gangs And Individuals, That Will Reduce Or Eliminate Criminal Street Gang Activities In Targeted Areas Throughout The San Diego Community." The project has developed a comprehensive, flexible, adaptable menu of objectives, tactics and strategies. The project will remove violent gang members from target neighborhoods through investigations, arrests and prosecutions. It will disrupt existing gang structures and activities in order to inhibit unlawful and intimidating activities; and conduct follow-up patrols to prevent gangs from re-establishing their activities or displacing to new locations once areas have been cleared. The project will be managed jointly by the commanders of the SDPD Gangs and Narcotics Units. SDPD requests \$342,590 in funds, primarily for overtime to conduct the various strategies; for state-of-the-art surveillance, entry and safety equipment; and vehicles necessary to conduct effective undercover operations. SDPD will contribute in \$102,777 in indirect costs as voluntary match.

1. PROBLEM STATEMENT:

The City of San Diego is the second largest city in California. Within the 342 square mile land area, plus over 50 square miles of bay, resides a population of 1,311,162.¹ The City faces unprecedented revenue difficulties. Because of attrition related to the fiscal difficulties, there are just 1,678 sworn officers available for duty, out of a budgeted strength of over 2,100. San Diego 1.28 officers per thousand residents is by far the lowest of any major U.S. city.

The population is 27% Hispanic, 15% Asian/Pacific Islander, and 7% African American. There are large Southeast Asian, Eastern European, Middle Eastern and African populations, often clustered in poor, crowded, dangerous neighborhoods. Research has demonstrated that immigrant populations, as found in San Diego are fertile breeding grounds for future gang activity. These enclaves contribute to San Diego's diversity, while at the same time generating communication and law enforcement complexities not present in communities that are more homogeneous.

The urgency of the City's gang situation is highlighted by the nine gang-related shootings and three gang-related homicides (one involving a 15 year old male and another a 20 year old male) over the past two months. The annual SDPD Crime Briefing on January 24th indicted that gang related homicides for the past year were up by 50%, assaults with deadly weapons were up by 3%, and robberies were up by 80%. From January to March 2007, there were 216 gang-related crimes in San Diego, including four homicides, four attempted homicides, and 53 assaults. 821 Gang members were arrested. There were 2,187 juvenile arrests during the same period. The city has 3,629 documented gang members; including 188 documented gang members under the age of 18.²

¹ All statistical information not otherwise attributed is taken from the "San Diego Association of Governments," (SANDAG) www.sandag.org.

²San Diego Police Department Crime Briefing, January –March 2007 Index of Crimes

SDPD detectives are familiar with at least 20 specific neighborhoods where criminal gang members congregate. These include Colina Del Sol, Lincoln Park, Valencia Park, Skyline, Shelltown, Encanto, Logan Heights and San Ysidro. In these communities, children are faced with gang violence on a daily basis. As part of a collaborative effort with the State Attorney General, the City Attorney and the Gang Commission, Gompers Charter Middle School, typical of the target areas, has a Safe Passage Collaborative. A survey was in May yielded the following:

| Survey Questions | 7 th Grade (247) | 8 th Grade (91) | 9 th Grade (34) |
|--|-----------------------------|----------------------------|----------------------------|
| Witnessed Fights | 68% | 70% | 62% |
| Witnessed graffiti or tagging | 51% | 55% | 62% |
| Witness others with weapons | 37% | 45% | 47% |
| Witnessed drug transactions | 36% | 26% | 44% |
| Witnessed others being robbed | 28% | 26% | 35% |
| Witnessed a shooting, stabbing or beating | 28% | 25% | 35% |
| Were in physical fight between groups or were jumped | 33% | 25% | 24% |
| Were physically hurt or threatened | 28% | 20% | 24% |
| Were robbed | 18% | 18% | 21% |

The Gompers survey demonstrates the risk factors that need to be corrected in the target areas – lack of a sense of safety, aggressive peers, gang presence and early delinquency – in order to foster communities which are nurturing of youth and safe for residents. This proposal targets these problem neighborhoods with a coordinated, multi-tactical plan that will suppress gang activity with an aggressive enforcement strategy to remove gang members and eliminate their activities from the streets.

2. PROGRAM DESIGN AND IMPLEMENTATION:

Target Area: The proposed Target Area is the City of San Diego. SDPD detectives are familiar with at least 20 specific neighborhoods where criminal gang members congregate -- including Colina Del Sol, Lincoln Park, Valencia Park, Skyline, Shelltown, Encanto, Logan Heights and San Ysidro -- and these areas will be specifically targeted. These include

Target Population: The program targets both hardened gang members and their affiliates and

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activities, as well as susceptible youth identified through existing alliances with school police, educators, community based organizations, patrol officers and community members.

Project Goal: To Conduct An Intensive, Multi-Faceted Project, Targeting Identified Communities, Gangs And Individuals, That Will Reduce Or Eliminate Criminal Street Gang Activities In Targeted Areas Throughout The San Diego Community.

Objectives:

- To identify, investigate and prosecute individual known or identified criminal gang members.
- To disrupt gang activities in a manner that impedes their ability to engage in successful recruitment, criminal enterprises, and other activities.
- To reduce the power and influence of gangs on susceptible immigrant communities.

Program Design: A large number of gang abatement tactics have been identified for application to this program in order to ensure a successful, productive project. Gang dynamics can shift quickly. An operation at one location may simply shift activities a few block or a few miles away. Consequently, our tactics are designed to be:

- **Adaptable**, so that they can be applied to a variety of gang-related problems within a jurisdiction, as well as to problems faced by a variety of jurisdictions.
- **Flexible** to respond quickly to, or anticipate, changes within gangs, gang problems, and community circumstances.
- **Multifaceted**, involving various government and private agencies that simultaneously address the factors that give rise to and sustain gang problems, and supportive of community participation in intervention efforts.³

Gang Suppression Strategies and Tactics: The project will develop carefully planned

³ *Addressing Community Gang Problems: A Model for Problem Solving.* Bureau of Justice Assistance Monograph, January 1997

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enforcement actions, with the goal of devising a comprehensive, adaptable plan to reduce or eliminate crimes and other problems caused by the targeted gangs. Planning includes:

- Consideration of gangs' background, MO, organization, and unique characteristics.
- Identify gangs near immigrant communities where there are high levels of victimization and potential for gang development.
- Analysis of gang patterns and trends.
- Development of strategies to incapacitate leaders and violent members and associates.
- Initiate cooperation with other criminal justice agencies in support of the overall strategy.
- Follow-up using all possible resources to secure and strengthen targeted neighborhoods, and prevent other gangs from filling the void left by successful gang elimination efforts.

Suppression Tactics: Because street gangs are heavily involved in drug-related crimes, our tactics employ a strong drug enforcement orientation and will be conducted in cooperation with the SDPD Narcotics Unit.

Confidential Informants and Undercover Officers. We anticipate cultivating and working with 12 Confidential Informants as a central strategy of gang suppression efforts is cultivation during this project. Under the direction of investigators, CI's provide two major services:

- Purchase drugs, weapons, and other items from, or sell them to, gang members who thereby expose themselves to arrest and prosecution.
- Provide intelligence such as gang members' identity, description, vehicle, address, telephone number, associates, prior crimes and MO; location of crack houses and other places of operation; assets and weapons; and planned crimes.

Surveillance/Arrest is a traditional approach to curb open-air drug trafficking by arresting involved parties. Surveillance may occur from undercover vehicles, buildings, or other locations, or an officer may observe transactions from a more distant point and identify the buyer

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and seller by radio to a patrol team, which then moves in and makes the arrests. In 2006, SDPD Gang officers made more than 800 arrests that resulted in prosecution. We anticipate that this project will result in a 20% increase, or an additional 160 arrests and prosecutions.

An Undercover House can be wired for internal and external surveillance, and set up as a sham drug sale house for sting operations and purchase of stolen property and weapons. Funding for one such location is requested in this proposal.

Buy/Bust Operations target drug sellers by using undercover officers to make drug buys. Patrol Officers then arrest the seller. We anticipate conducting 12 such operations under this project.

Interdiction of gang drug supplies through traffic stops supported by observation of illegal activity, or at least by reasonable suspicion based on surveillance, informant driven information and intelligence information from Title III wire taps. Non-quantifiable.

Environmental Preventions, such as street barriers, which include changes to surroundings area, are implemented to impede gang and drug activities.

Sweeps focus intense police, probation and parole resources on criminal activity to remove a large number of gang members from the area in a short time. The sweep locations are identified through "Hot Spot" analysis and are specifically targeted on spikes of violence in problematic neighborhoods. Sweeps are followed by government and private efforts to implement positive changes to the area in order to discourage recurrence of the criminal activity. We anticipate conducting ten sweeps in conjunction with project activities. Coordination with the Gang Commission will assist in follow-up.

Execution of Warrants is based on the habitual criminality of hardcore gang members, and the likelihood that there are outstanding arrest or bench warrants for them. Executing warrants can be highly effective in removing criminal persons or groups from an area. Search warrants on crack or stash houses and clandestine labs are also effective. We anticipate executing 25

warrants as part of this proposed program.

Surveillance is appropriate in many investigative contexts. Techniques applicable to gangs include use of listening devices, wiretaps, body wires, car-tagging devices for electronic tracking, audio and video equipment, and simple observation.

Follow-up Investigations will be conducted as appropriate. Both Gang and Narcotics officers will be used for follow-up intense observation on locations or groups previously targeted to detect any future activity. Follow-ups are useful in probation revocation, three-strikes charges, intelligence gathering, gang enhancement statutes, and other tactics.

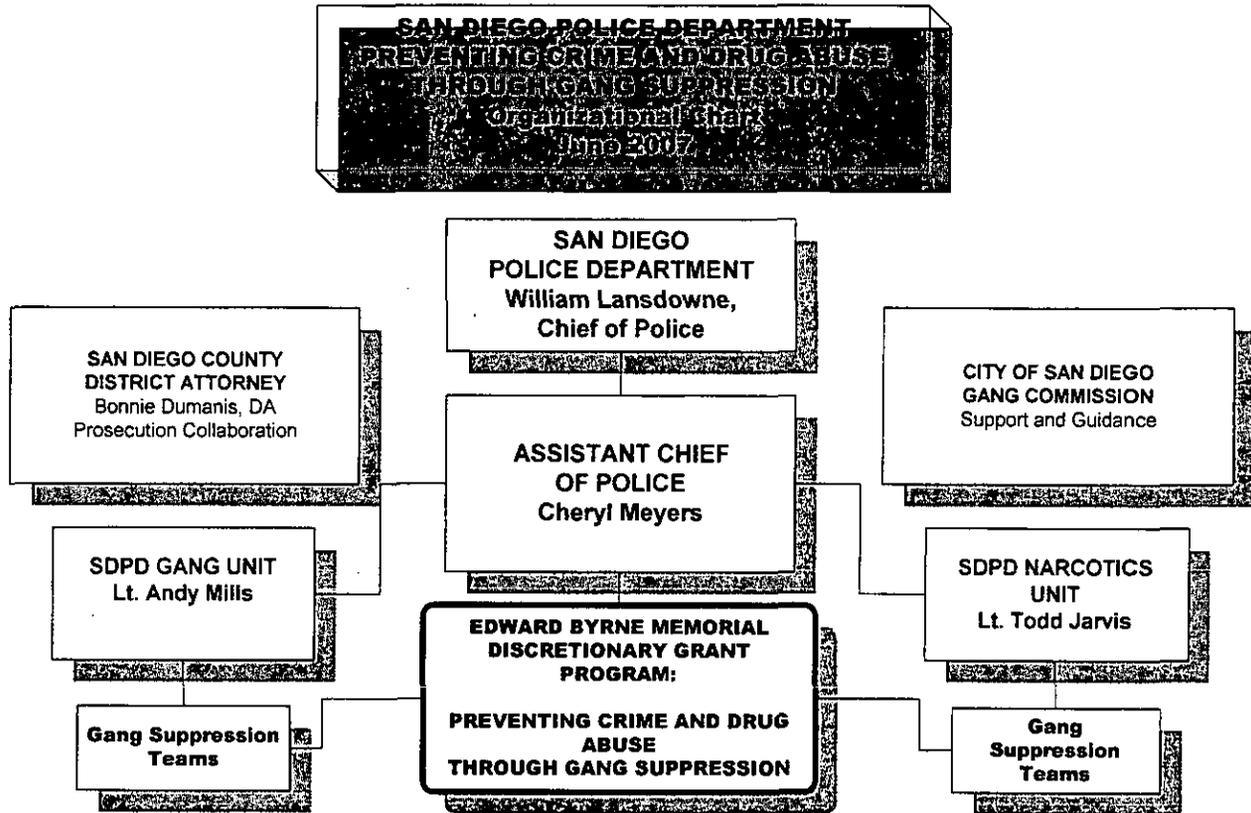
The San Diego Violent Crimes Task Force is run by FBI, and supervised by an SDPD Gangs Sergeant Detective Andres Andy Rios. The Task Force conducts joint, long-term investigations on organized crime, violent street gangs, and drug trafficking organizations, with the goal of preventing prevent further escalation of these incidents. The task forces offer a framework that often can expand the effectiveness of investigations by maximizing coordination and resources.

Directed Patrol provides relevant information about gang-related problem to uniformed officers, who proactively enforce drug and other criminal laws and local ordinances. Visible police presence hinders gang street activities and encourages citizens to participate in safe outdoor neighborhood activities.

Police-Prosecutor Collaboration is a traditionally employed tactic in San Diego. This facilitates vertical prosecution, Preparation and execution of search warrants, avoidance of tactics which may be disallowed by courts, selection of charges most likely to result in no bail or high bail, asset seizure and forfeiture, and prosecutor presence at the scene of raids and other operations to provide on-the-spot advice as legal questions arise.

Drug and Gang Free Zones will be examined for feasibility, given the expanded resources made available by this grant funding.

Organization and Management Structure:



3. CAPABILITIES/COMPETENCIES:

San Diego Police Department Street Gang Unit consists of 20 Detectives, 28 uniformed officers, 11 Sergeants, and two Lieutenants organized into five Gang Suppression Teams (GSTs). The mission is to reduce gang related criminal activity and the number of active gang members in the community. Uniformed Unit personnel respond immediately to all gang related felony crimes during normal working hours (1400-2400 hours) and support area command personnel with preliminary investigations. Personnel also monitor gang activity throughout the city and take appropriate enforcement action. Investigative personnel respond to crime scenes involving gang members and initiate a thorough investigation, including preparing the case for prosecution. Unit personnel make approximately 800 arrests yearly for gang related crimes. They also conduct approximately 8,000 yearly field interviews of persons of interest.

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San Diego Police Department Narcotics Unit consists of one lieutenant, five detective sergeants, 19 detectives and two uniformed officers. There are also three area command narcotic teams available to assist on operations. They include another three detective sergeants, 13 detectives and two uniformed officers. The unit mission is to conduct pro-active investigations of suspected illegal drug dealers and locations, and to employ the most effective methods of law enforcement in the areas of illicit drug use and sales within the City of San Diego.

Centralized Narcotics Unit personnel alone make approximately 900 arrests yearly for. 10% to 20% of these are gang related. Members of the Narcotics Unit serve approximately 115 search warrants per year. They currently manage twenty-eight confidential informants.

San Diego Police Department Juvenile Administration Unit consists of one lieutenant, one sergeant, three POIs and a Police Service Officer. The Unit is responsible for policy and procedure recommendations and updates based on technological or juvenile law changes. They disseminate information to Juvenile Service Teams and patrol officers, develop and implement training related to juvenile issues, coordinate Diversion Programs, assist the Juvenile Service Teams with Department-wide projects and problem solving, and coordinate the Elementary School Safety Program (ESSP) including drug awareness and abuse and gang education. Juvenile Admin assists the eight Divisions Juvenile Service Teams with enforcement sweeps to control daytime loitering and gang activity.

The administer the Parent Notification Letter which identifies juveniles who are possibly involved in illegal activity through Field Interviews and sends a letter to their parents advising them of the activity and giving them several references to help deal with the problems.

They partner with other agencies, such as the Gang Unit, SD City School Police, Probation and CBOs, to conduct educational meetings for school administration, parents and students on gang issues and other juvenile related issues such as drugs and internet problems.

Juvenile Service Teams: The Division Juvenile Service Teams consist of one sergeant, one or two detectives, and three POIs who are responsible for all juvenile related issues at their commands. They teach ESSP at Elementary Schools and handle all training and monitoring of their school's Safety Patrol teams. The Detectives handle all juvenile crime and utilize Diversion when possible with eligible juveniles. They conduct truancy sweeps, daytime loitering sweeps and gang sweeps as an enforcement tool.

The San Diego Gang Commission was implemented by Municipal Code by the City Council in April 2006. The Mayor appoints members with specific subject matter expertise or geographic representation to the 17 seats. One representative each is appointed from: each of the eight City Council districts and one at large; K-12 education; a community organization working on gang issues; law enforcement; public health; social services; the San Diego Association of Governments; the San Diego Workforce Partnership; and a reformed gang member.

4. IMPACT/OUTCOMES, EVALUATION AND SUSTAINMENT:

Linking Implemented Response With Targeted Problem: The program is designed to directly and forcefully suppress and prevent the problem of gang activities in the target neighborhoods, as identified on an ongoing basis. Gang and Narcotic officers are well aware of where the problem gang activity occurs, and of the propensity of enforcement activities to displace and reposition the individual and their criminal activities. Therefore, the activities and tactics are adaptable, flexible and mobile. The entire project, all activities and tactics conducted, will be fully documented in an ongoing series of progress reports, culminating in a final comprehensive report at the end of the funded project. Such information as drug/gang crimes, gang assemblages, shootings, raucous and disruptive behavior, harassment, and gang recruitment efforts will be quantified and identified by location in order to document ongoing progress and results. After a response has been implemented, staff will conduct an analysis of the target

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location to determine what effect was achieved, such as reduced crime and loitering and resident perceptions of safety.

Sustainability: The equipment and supplies provided by the project will ensure sustainability, and they represent durable resources unavailable through regular City funding channels. SDPD is committed to dedicating all possible staff power to the eradication of gangs from our communities, and this will continue to be a priority.

Determining How the Problem Was Affected: The impact of the project will be evaluated by its effect on the problems identified. An outcome evaluation will be conducted at the end of the project to quantify and measure the effect that the overall project had on the problem in the various locations. Outcomes will include 1) reduction of observed gang/drug activity; 2) reduced community crime rates; 3) increased gang member arrest, investigation, prosecution and incarceration, 4) more peaceful and orderly communities, 5) resident perception of safer streets, 6) school and community organization reports on quantity of objectionable activities, and other indicators as identified. Changes in seriousness, frequency and audacity of gang activities are also valid measures of project impact.

**CITY OF SAN DIEGO POLICE DEPARTMENT
DIVISION MAP**

