



May 3, 2002

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Development Services

Mr. Kelly Broughton
Deputy Director
Development Services Department
1222 First Avenue
San Diego, California 92101

Re: Geotechnical investigation authorization procedure

Dear Mr. Broughton:

It was a pleasure meeting with you last week on the issue of standardizing the geotechnical investigation authorization process. The meeting was informative and useful for understanding the needs of the City, as well as the needs and concerns of the geotechnical and construction industries.

You have asked for input from Geocon on recommendations in formulating and standardizing the geotechnical investigation process. The following are general concerns and points Geocon believes to be important the authorization process. Geocon articulates these concerns in a somewhat general form because it is important that they be approached from a global form and refined to the specific form. It is crucial to Geocon and the geotechnical community that we continue to have input into the final geotechnical investigation authorization process to ensure an efficient, workable product and scheme are formulated. To that end, Geocon makes the following recommendations and comments:

Recommendations for Procedure to obtain geotechnical investigation permit

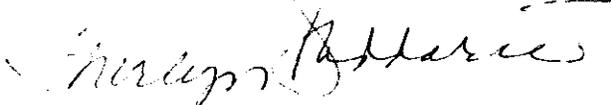
1. Authorization for geotechnical investigation be a Process I procedure, determined by staff without resort to public hearing;
2. A clear, unambiguous checklist setting forth what is required to obtain an authorization for geotechnical investigation or reconnaissance;
3. A clear, unambiguous, consistent policy agreement between City departments as to what is required to obtain authorization for geotechnical investigation or reconnaissance;
4. That clear guidelines and policies be implemented to provide for reasonable ingress and egress to geotechnical investigation sites and for follow-up mitigation, as needed;

5. That measures be taken so as to allow the geotechnical investigation authorization process be completed within 30 days;
6. That the terms of a Site Development Permit be clearly articulated and consistently applied. If a Site Development Permit is required, that such permit/authorization not be characterized as a permit *per se* so as to eliminate the two simultaneous permit restriction contained in the applicable regulations;
7. Once geotechnical investigation is completed, a two level mitigation procedure be implemented. In the first phase, erosion control measures be undertaken utilizing silt fences and/or sandbags. At the second level, if development is not commenced within two years, or six months after the City's final project approval, whichever first occurs, the developer or owner will reasonably restore the terrain and revegetate.
8. While the City is working out the procedures and methods for authorizing and conducting predevelopment or due diligence geotechnical investigations, that the geotechnical community be allowed to conduct such investigations, as in the past, exempted from the need to obtain a permit. If an authorization is required, that such authorization not be characterized as a permit so as to eliminate the two simultaneous permit restriction contained in the applicable regulations.

Thank you for allowing Geocon to present this input. If you wish to discuss these issues please do not hesitate to contact me or anyone else at Geocon.

Very truly yours,

Geocon, Incorporated



Shirlyn Daddario
General Counsel

SD:fyf