



THE CITY OF SAN DIEGO

002063

City of San Diego
Office of the City Clerk
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San Diego, CA 92101
(619) 533-4000

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Recommendations
Community Planning Group/
Staffs/Planning Commission

Project Manager **must** complete the following information for the Council docket:

CASE NUMBER: Archstone Mission Gorge - Project Number 142570

Staffs: CERTIFY Environmental Impact Report No. 142570, ADOPT the Mitigation Monitoring and Reporting Program, and ADOPT the Findings and Statement of Overriding Consideration; ADOPT Amendments to the General Plan, and the Land Use Plan (Navajo Community Plan), APPROVE Site Development Permit No. 498703, Vesting Tentative Map No. 498719, and Easement Abandonment No. 589137; and APPROVE Rezone No. 586364.

Planning Commission:

YEAS: Commissioners, Griswold, Ontai, Otsuji & Golba

NAYS: Commissioner Naslund

ABSTAINING: Commissioner Schultz and Smiley not present

Recommended Action: On October 16, 2008, the Planning Commission recommended the City Council approve Staff's Recommendation, as listed above, with the following two recommendations: 1) That the project shall maintain the proposed 10 percent of the total rental condominium units on-site for households with an income at or below 65 percent AMI, and the proposed 10 percent of the total rental condominium units on-site for moderate income households shall be increased to 15 percent for a total of 25 percent on-site affordable rental condominium units. 2) That the project shall include a photovoltaic system (i.e. solar panels) sufficient to generate the proposed common use area's projected energy consumption.

Community Planning Group: Navajo Community Planners Inc.

LIST NAME OF GROUP:

- ☐ No officially recognized community planning group for this area.
- ☐ Community Planning Group has been notified of this project and has not submitted a recommendation.
- ☐ Community Planning Group has been notified of this project and has not taken a position.
- ☐ Community Planning Group has recommended approval of this project.
- ☒ **Community Planning Group has recommended denial of this project.**
- ☐ This is a matter of City-wide effect. The following community group(s) have taken a position on the item:

In Favor:

Opposed:

By:

Jeffrey A. Peterson, Development Project Manager

*This information is available in alternative formats for persons with disabilities.
To request this information in alternative format, call (619)446-5446 or (800)735-2929 (TDD)*

Office of
The City Attorney
City of San Diego

MEMORANDUM
MS 59

(619) 533-5800

DATE: October 16, 2008
TO: The Planning Commission
FROM: City Attorney
SUBJECT: Analysis of the Archstone Mission Gorge Project, Project No. 142570, Item PC-08-084

INTRODUCTION

The Archstone Mission Gorge Project, Project No. 142570, [Archstone Project] proposes to redevelop a 10.2 acre site in the Navajo Community Planning Area that now contains a 114 residential unit mobile home park into a 444 unit residential condominium complex. The Archstone Project is subject to a Process 5 decision. Accordingly, the Planning Commission is to consider whether to recommend to City Council the following actions:

1. Certifying Environmental Impact Report No. 142570, and adopting the associated Mitigation Monitoring and Reporting Program, and Findings and Statement of Overriding Considerations.
2. Adopting proposed amendments to the General Plan and to the Navajo Community Plan No. 498721.
3. Adopting a proposed Rezoning Ordinance No. 5863664.
4. Approving Vesting Tentative Map No. 498719, Site Development Permit No. 498703, and Easement Abandonment No. 589137.

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Name: The Planning Commission
Date: October 16, 2008
Page: 2 of 10

QUESTIONS PRESENTED

1. Must the Planning Commission make particular findings to remove the Mobilehome Park Overlay Zone from the subject site to allow the Archstone Project?
2. Must the Planning Commission find the Archstone Project is consistent with the Residential Element of the Navajo Community Plan?
3. Is the Planning Commission required to review the Archstone Project Relocation Impact Report and arrive at conclusions regarding its adequacy?
4. Does the Archstone EIR need to be revised and recirculated before Planning Commission makes a recommendation to City Council regarding approval of the Archstone Project?

SHORT ANSWERS

1. Yes. To remove the Mobilehome Park Overlay Zone for the Archstone Project, the Planning Commission must make particular findings, pursuant to San Diego Municipal Code section 123.0105.
2. Yes. The Planning Commission has a duty under Government Code Section 65863.7(e) to review the report and may require the Archstone Project to mitigate any adverse impacts it identifies. In addition, the San Diego Municipal Code requires those considering discontinuance of a mobile home park to "minimize the adverse impact on the housing supply and on displaced persons..." San Diego Municipal Code § 143.0610. Finally, the Commission must make the Supplemental Findings at Municipal Code section 126.0504(k).
3. Yes. The City must provide full and adequate disclosure of the potential impacts to residents that will be dislocated by the Archstone Project pursuant San Diego Municipal Code section 143.0610 and to Government Code section 65863.7.
4. Yes. The Archstone EIR fails to sufficiently analyze and disclose the Archstone Project impacts to several City natural resources, including San Diego River species, habitat, and floodplains, as required by CEQA section 21000.

ANALYSIS

1. Findings Required to Remove the Mobilehome Park Overlay Zone for the Archstone Project.

Mobilehome parks constitute a critical but dwindling element of the affordable housing mosaic of San Diego, especially in the northern part of the City. The City Mobilehome Park Overlay

Name: The Planning Commission

Date: October 16, 2008

Page: 3 of 10

Zone identifies eighteen of the twenty-four remaining mobilehome park clusters south of Route 8, clustered near the international border. The Archstone Project would demolish one of six remaining mobile home park clusters north of Route 8, and the only one in the Navajo Community. San Diego Municipal Code, Chapter 13, Art. 2, Diagram 132-07A.

The purpose of the Mobilehome Park Overlay Zone is to:

... to **preserve existing mobilehome** park sites, consistent with the City's goal of **accommodating alternative housing types**...

San Diego Municipal Code § 132.0701. *Emphasis added.* Additionally, pursuant to San Diego Municipal Code section 132.0705, the only permitted use of a mobilehome park in the Mobilehome Park Overlay Zone is to accommodate mobilehomes intended for use as single-unit dwellings. In other words, a condominium project by definition is not permitted in the Mobilehome Park Overlay Zone. The purpose of the Mobilehome Park Overlay Zone is to preserve residential mobilehome park sites. The Archstone Project does not preserve the subject mobilehome park, it would demolish it, and therefore is not permitted in the proposed location.

If the Planning Commission is unable to find the Archstone Project is consistent with the underlying use and purpose of the Mobilehome Park Overlay Zone, then it must make findings to support a recommendation to City Council, that the underlying property be rezoned according to the standard established by San Diego Municipal Code section 132.0705, which states:

The City Council may approve a zoning or rezoning action whenever **public necessity or convenience, the general welfare, or good zoning practice** justifies this action.

San Diego Municipal Code § 132.0705(b). *Emphasis added.* The Planning Commission must justify its findings to support rezoning the subject property in reliance on substantial evidence. Code Civil Proc. § 1094.5(d). Substantial evidence means facts not unfounded assumptions, and it means relying on expert opinion not mere argument.

2. Findings Required to Show Archstone Project Consistent with the Residential Element of the Navajo Community Plan.

The Planning Commission must carefully consider whether the removal of the Mobilehome Park Overlay Zone is consistent with the Navajo Community Plan. The community plan was most recently amended on May 15, 2007, and establishes the future of the development of the Navajo community. It was adopted by the City as consistent with the City's Progress Guide and General Plan, which forms the City's comprehensive development plan under California Government Code section 65300. Thus the zoning and land use proposed by the Archstone Project must be consistent with the Navajo Community Plan to comply with state law.

Name: The Planning Commission

Date: October 16, 2008

Page: 4 of 10

The Residential Element of the Navajo Community Plan affords protection to the mobile home parks in the community against redevelopment for other land uses. The plan identifies its sole mobile home park cluster, consisting of two mobilehome parks, located at Mission Gorge and Old Cliffs Roads:

Two mobile home parks are located in the community in the vicinity of Mission Gorge Road. One is located near the intersection of Old Cliffs Road and Mission Gorge Road and the other is located at the eastern end of Old Cliffs Road. The **Mobile Home Park Overlay Zone** has been applied to both of these areas. **This overlay zone provides protection for the residents of the mobile home parks against development of the sites for other uses and ensures the availability of varied housing types to create a more balanced community.**

Navajo Community Plan, page 15. *Emphasis added.* The community plan emphasizes retaining mobilehome parks in the community to ensure a variety of housing types:

To provide a more complete variety of housing types, the Mobile Home Park Overlay Zone **should be retained** on the existing mobile home park sites.

Navajo Community Plan, page 20. *Emphasis added.* Additionally, the community plan directs as an "immediate priority" for residential development the following to goals:

Vary housing types and densities to create interest and provide a mix of economic and social characteristics. Implement the **Mobilehome Park Overlay Zone.**

Navajo Community Plan, page 132. *Emphasis added.* Clearly, the community plan explicitly protects against the redevelopment of mobilehome parks for other types of housing. The Archstone Project is not consistent with the Residential Element of the community plan because it would demolish an existing mobilehome park.

Land use plans include adopted community plans. San Diego Municipal Code § 113.0101. San Diego Municipal Code section 122.0101 requires standardized review of any amendment to a community plan.

The purpose of these procedures is to **standardize the review process** for the adoption of new land use plans and the privately or publicly initiated amendment of adopted land use plans.

Emphasis added. San Diego Municipal Code § 122.0101. The Planning Commission must therefore consider amending the Navajo Community Plan to allow the Archstone Project but to do so it must find the Archstone Project will not adversely affect the Navajo Community Plan,

Name: The Planning Commission

Date: October 16, 2008

Page: 5 of 10

will not be detrimental to the public health, safety, and welfare; and, will comply with the applicable regulations of the Land Development Code. San Diego Municipal Code § 126.0504.

3. State and Local Requirements Regarding Mobile Home Closure and Requirement for an Adequate Tenant Relocation Impact Report.

Both the Government Code and San Diego Municipal Code require that applicants seeking to close a mobilehome park must file a report on the impact of the conversion, closure or cessation of use upon the displaced residents of the mobilehome park to be converted or closed. California Government Code § 65863.7 and San Diego Municipal Code § 143.0610 et. seq.

Government Code section 65863.7(a) states that, "In determining the impact of the conversion, closure, or cessation of use on displaced mobilehome park residents, the report shall address the availability of adequate replacement housing in mobilehome parks and relocation costs."

The state code additionally assigns duties to "the legislative body, or its delegated advisory agency" to "review the report" and states that it "may require, as a condition of the change, the person or entity to take steps to mitigate any adverse impact of the conversion, closure, or cessation of use on the ability of displaced mobilehome park residents to find adequate housing in a mobilehome park." Govt. Code § 65863.7(e).

The intent of the San Diego Municipal Code section on mobilehome park discontinuance and tenant relocation is to "benefit the general public by minimizing the adverse impact on the housing supply and on displaced persons by providing certain rights and benefits to tenants and by requiring tenant relocation assistance whenever an existing mobilehome park or portion thereof is converted to another use." San Diego Municipal Code § 143.0610.

The Municipal Code requires applicants seeking to discontinue a mobilehome park to apply for and process a Site Development Permit, Process Three. At San Diego Municipal Code section 143.0630(c), the requirement that applicants prepare a relocation plan for transmission to the San Diego Housing Commission is stated. That section states, in part, that:

"The relocation plan shall provide for the relocation of the tenants who will be displaced by the discontinuance of the use of the property as a mobilehome park or by the conversion of mobilehome spaces to other uses. The relocation plan shall comply with standards and regulations for relocation plans developed by the San Diego Housing Commission."

Id. Pursuant to the requirements under SDMC section 143.0630(d), the Archstone Project did prepare and submit a Relocation Impact Report that was approved by the San Diego Housing Commission on August 4, 2008.

Name: The Planning Commission

Date: October 16, 2008

Page: 6 of 10

The question before the Planning Commission is whether the Relocation Impact Report, as prepared by the Archstone Project, and approved by the Housing Commission, is sufficient to satisfy the requirements of state law and the San Diego Municipal Code.

An operative element of the Government Code requirement for mobile home relocation plans is that it "shall address the availability of adequate replacement housing *in mobilehome parks* and relocation costs." Gov't Code § 65863.7(a). *Emphasis added.*

According to the Relocation Impact Report prepared by Overland, Pacific & Cutler, Inc., the firm was unable to assess the age of 58 out of 98 – or nearly 60 percent – of the mobile home coaches that remain owner-occupied in Mission Valley Village. Relocation Impact Report, page 6. Of the remaining coaches, 32 of the mobile homes are between 21 and 41 years old.

The ages of coaches are a critical element for the mobile home park residents' ability to relocate to other mobilehome parks, and the Relocation Impact Report acknowledges this in a discussion on pages 7 through 10 of the Overland, Pacific submission. The firm found 87 mobilehome park spaces available in parks in San Diego, El Cajon, Chula Vista and Spring Valley. Of the spaces located, 46 of them are available only for coaches built since 1990. Another 16 spaces identified are available only for new coaches.

Given the ages of the coaches in Mission Valley Village, and surmising that most of the coaches that Overland, Pacific was unable to assess are close in age to those within the park that were assessed, it is likely that no more than 20 of the 98 owner-occupied homes in Mission Valley Village can be relocated to another mobilehome park within the jurisdictions surveyed by Overland, Pacific.

An additional factor which was analyzed by Overland, Pacific is the rental rate charged for mobilehome spaces in the parks in San Diego County. The consultants found that 16 of 21 parks surveyed had space rents below the \$725 per month charged at Mission Valley Village. They also identified 31 available spaces in parks with rents below Mission Valley Villages. However, of those 31 available spaces, only 7 appear to be available for rent for homeowners with coaches built before 1990.

The Rancho Mesa Mobile Home Park in El Cajon has the largest number of available spaces – 35 in total – yet that park charges \$980 per month space rent – or \$255 per month more than Mission Valley Village – and allows only coaches 7 years old or newer.

The Relocation Impact Report does not analyze the differential issue, as just explained, and the Archstone Project makes no provision for assisting coach owners with covering the differential between space rents at Mission Valley Village and any of the other, more expensive, mobile home parks with space availability.

Overland, Pacific was only able to gather income information from 49 of the 71 responding households, or 50 percent of the total owner-occupied households in the park. Of those

households, 22 were identified as very low income (31 to 50 percent of Area Median Income (AMI)) while 24 were identified as low income (51 to 80 percent of AMI). Archstone Smith proposes to provide a "right of first refusal" for units to former residents of the Mission Valley Village. However, the Applicant intends to dedicate only 10 percent of its units to applicants earning at less than 65 percent of AMI. The additional 10 percent of affordable units would be available to households earning up to 120 of AMI – a level of "affordable rents" which would appear to be outside the range most residents of Mission Valley Village could afford.

The Planning Commission and the City Council must make Supplemental Findings for a Site Development Permit for a Mobilehome Park Discontinuance. Those findings are stated at San Diego Municipal Code section 126.0504(k) and provided below:

A Site Development Permit required in accordance with Section 132.0702 because a discontinuance of a mobilehome park is proposed may be approved or conditionally approved only if the decision maker makes the following supplemental findings in addition to the findings in Section 126.0504(a):

- (1) The discontinuance of use of the land for a mobilehome park or mobilehome spaces will not deprive the community of a needed facility;
- (2) The discontinuance of use of the land for a mobilehome park or mobilehome spaces, because of the associated relocation plan and conditions that have been applied to the discontinuance, will not be detrimental to the public health, safety, and welfare of persons living in the mobilehome park; and
- (3) The use to which the applicant proposes to put the property will provide a greater public benefit than continued use of the property as a mobilehome park or mobilehome spaces.

4. Adequacy of the Archstone EIR Analysis of Impacts to and Mitigation for the Degradation of Natural Resources.

(a) Impacts to Biological Resources

The Archstone Project is to be built within the San Diego Multiple Species Conservation Program (MSCP) San Diego Subarea. While no sensitive wildlife has been observed within the project site, "there is a moderate potential for Cooper's hawk to nest in the mature pine trees within the project area." EIR at 4.7-8. Cooper's hawk is a species covered by the MSCP. Land Development Manual, Biology Guidelines (2001) at 36. The Archstone EIR states that removal of an active raptor nest, or causing nest abandonment, would be a significant impact. EIR at 4.7-8. It concludes that significant impacts would be prevented by the proposed mitigation. *Id.* at 4.7-11. However, the Archstone EIR does not contain sufficient analysis to justify this conclusion.

Name: The Planning Commission
Date: October 16, 2008
Page: 8 of 10

The Archstone EIR requires, as mitigation for the Cooper's hawk, that "no clearing, grubbing, grading or other construction activities shall occur between February 1 and September 15, the raptor breeding season" until a pre-grading survey is done for active raptor nests within 300 feet of the development area. EIR at 4.7-10 to 11. If active raptor nests are detected, the project biologist must include in his/her report mitigation that conforms to the City's Biology Guidelines

This mitigation is flawed in two respects. First, the mitigation, as written, does not require a survey for raptors before the removal of the trees in which they may be nesting. The mitigation requires only a pre-grading survey; its language does not require a grading prior to grubbing, for example, removing trees. Thus, the mature pines that the EIR identifies as providing potential nesting habitat for Cooper's hawk could be removed during construction prior to any survey or mitigation. The terms of the mitigation therefore do not support the Archstone EIR's conclusion that it would mitigate impacts to below the level of significance.

Second, even if that oversight in the mitigation were to be remedied, the document would nonetheless lack analysis regarding the significance of impacts to Cooper's hawks and other raptors once the trees are permanently removed. While the EIR expresses the intent (if not the precise language necessary) to protect nesting raptors from disturbance by the construction, raptors and their habitat would nonetheless suffer impacts if trees in which they nest are removed prior to their return the next nesting season. As stated above, the EIR recognizes that "[b]ecause construction activities could be disruptive to these birds, project impacts would be significant." The EIR provides no explanation why significant impacts would not also occur were previously active nests to be permanently removed once the birds had fledged and the construction finished. Because the EIR fails to address this permanent removal of raptor habitat in its discussion of potential impacts or possible mitigation it fails to "provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment..." *Laurel Heights Improvement Assn. v. Regents of University of California* 47 Cal.3d 376, 391 (1988).

(b) Impacts to Floodplains

The EIR also suffers from a lack of analysis of whether and how the Project can be built in a 100-year floodplain. The Archstone EIR states:

The proposed project would place fill within the 100-year floodplain of the San Diego River to raise the elevation out of the floodplain. The lowest floor of the proposed residential structures in this location and throughout the project site would be a minimum of two feet above the base flood elevation.

EIR at 4.9-3. The EIR thereafter concludes with a statement that using an underground storm drain system would reduce impacts to downstream properties and therefore not alter the flow or flood potential of the San Diego River. *Id.* at 4.9-4. In so doing, the EIR fails to address the

Name: The Planning Commission

Date: October 16, 2008

Page: 9 of 10

City's requirements for construction within floodplains and the environmental significance of building permanent structures within the 100-year floodplain.

The City of San Diego Municipal Code contains standards for development within Special Flood Hazard Areas. San Diego Municipal Code § 143.0145. These standards, like all the development regulations for Environmentally Sensitive Lands, "serve as standards for the determination of impacts and mitigation under the California Environmental Quality Act...." San Diego Municipal Code § 143.0101.

It appears that these standards apply to that portion of the project contained within the 100-year floodplain. A map of the City's Special Flood Hazard Areas can be found in the Draft San Diego Flood Plain Mitigation Plan.¹ Although the scale of the map of Special Flood Hazard Areas is too large to be able to definitively tell, it looks as though the Project Area may fall within the "100 Year Flood Plain (A Zones)" for the San Diego River as delineated on the map. In addition, the EIR lists as a significance threshold whether the Project would "develop wholly or partially within the 100-year floodplain identified in the FEMA maps...." These referenced FEMA maps are not identified further, but they could correspond to the "Flood Insurance Rate Maps (FIRM), published by the Federal Emergency Management Agency (FEMA)" referred to by the Municipal Code as providing the basis for delineating Special Flood Hazard Areas treated by the regulations. San Diego Municipal Code § 143.0145 (a).

Were the Project located within a Special Flood Hazard Area, numerous Code provisions would apply that the EIR would need to address. For development within Floodways, for instance, the Code specifies that "[s]tructures shall not be attached to a foundation, in order to readily move them in case of flood" and that such structures "shall be removed upon imminence of flooding, as predicted by the National Weather Service or local public weather broadcast." San Diego Municipal Code § 143.0145 (e)(2)(A) & (B). This would obviously necessitate an analysis of whether permanent structures can be placed within the area of the Project contained within the 100-year flood plain, an analysis not currently contained in the EIR.

Were the Project located within a Flood Fringe rather than Floodway, its "permanent structures and fill for permanent structures" are permitted only if a number of conditions are met, including that the "development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works... nor will it cause adverse impacts related to flooding of properties located upstream or downstream, nor will it increase or expand a (FIRM) Zone A." San Diego Municipal Code § 143.0145 (f)(1)(B). Again, the EIR fails to address these issues. For instance, while the EIR states that the fill will elevate the Project out of the floodplain, it does not address how filling the floodplain may increase or expand the floodplain elsewhere by altering the landscape within the project area. Consequently, the EIR also fails to address whether the alteration of the landscape to elevate the Project could require that off-site flood protective works be constructed.

¹ Map, Special Flood Hazard Areas, Page B-2 of the Draft San Diego Flood Plain Mitigation Plan found at <http://www.sandiego.gov/engineering-cip/projectsprograms/floodmitigation.shtml>.

Name: The Planning Commission

Date: October 16, 2008

Page: 10 of 10

Because the EIR neither mentioned nor discussed the Project's compliance with the above regulations, it failed to analyze the significance of building within a 100-year flood plain under CEQA. Accordingly, the Archstone EIR fails to "provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment...." *Laurel Heights Improvement Assn.*, 47 Cal.3d 376, 391.

CONCLUSION

In sum, the Planning Commission should recommend denial of the Archstone Project unless it can make adequate findings, based on substantial evidence, regarding the Mobilehome Park Overlay Zone, the Navajo Community Plan, and the discontinuance of the mobilehome park. Further, the Planning Commission must refrain from recommending adoption of the Archstone EIR, and associated documents, until the biological and floodplain issues are re-analyzed and recirculated for public comment and review.

MICHAEL J. AGUIRRE, City Attorney

By

Marianne Greene
Deputy City Attorney

MOG:mg



ENTITLEMENTS DIVISION
(619) 446-5460

Final ENVIRONMENTAL IMPACT REPORT

Project No. 142570
SCH No. 2008021145

SUBJECT: ARCHSTONE MISSION GORGE. COMMUNITY PLAN AMENDMENT and REZONE to remove the site from the Mobile Home Park Overlay Zone; EASEMENT ABANDONMENT; VESTING TENTATIVE MAP for a condominium (for rent) development; and a SITE DEVELOPMENT PERMIT for the subdivision and construction of a multi-family development on a premise containing environmentally sensitive lands (ESL), discontinuance of a mobilehome park within the Mobilehome Park Overlay Zone, deviations from development regulations, and development in the Community Planning Implementation Overlay Zone (CPIOZ) Type B area. The project proposes to replace an existing 119-unit mobile home park and construct a new 444-unit-multi-family apartment complex of three- and four-story buildings, leasing facility, fitness facility, and club room that would wrap around a 5.5-level parking structure. The 10.2-acre project site is located at 6850 Mission Gorge Road at the northwest corner of Mission Gorge Road and Old Cliff Road in the city of San Diego (APN 458-030-17-00). The project site is located in the RM 3-7 (multi-family residential) zone and is designated for multi-family residential development at 30-43 dwelling units/acre (du/ac) as identified in the Navajo Community Plan (NCP). The project does not propose a change to the existing RM-3-7 zone. The project site is within the Mobile Home Overlay Zone, CPIOZ Type B area, and FAA Part 77 Noticing Area for Montgomery Field. The applicant proposes to set aside a minimum of 20 percent ~~(90 units)~~ of the units on-site for affordable housing and would conform with the Inclusionary Affordable Housing Requirements and Council Policy 600-27(A) criteria for the Affordable/In-Fill Housing Expedite Program which requires at least 10 percent of the units on-site to be set aside for households with an income at or below 65 percent Area Median Income (AMI) for rental units. Applicant: Archstone

This document has been prepared by the City of San Diego Environmental Analysis Section and is based on the City's independent analysis and conclusions made pursuant to State of California Environmental Quality Act (CEQA) Section 21082.1 and City of San Diego Municipal Code Section(s) 128.0103 (a) and (b).

UPDATE: Subsequent to the distribution of the Draft EIR, minor text revisions and clarifications have been incorporated into the final document and are shown in a ~~strikeout~~/underline format. These clarifications do not affect the environmental analysis or conclusions of this document; new environmental impacts have not been identified as a result of these changes; and new mitigation measures would not be required.

Recirculation of the environmental document is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR pursuant to CEQA Section 15088.5-Recirculation of an EIR Prior to Certification.

CONCLUSIONS:

This Environmental Impact Report (EIR) analyzes the environmental impacts that would result from the proposed Archstone-Mission Gorge project. The analysis discusses the project's potential impacts to **Land Use, Transportation/Traffic Circulation/Parking, Biological Resources, Air Quality, Global Warming, Landform Alteration/Visual Quality/Community Character, Noise, Public Services and Facilities, Public Utilities, Hydrology, Water Quality, Historical Resources, Human Health/Public Safety/Hazardous Materials, Geology/Soils, Population and Housing, Growth Inducement, and Cumulative Impacts.**

The required discretionary approvals include an Amendment to the Navajo Community Plan, Rezone to remove the Mobilehome Park Overlay Zone, Easement Abandonment to vacate existing public utility easements, Vesting Tentative Map and Site Development Permit. The Archstone Mission Gorge project proposes to replace an existing 119-space mobile home park and construct a new 444-unit-condominium (for rent) complex of three- and four-story buildings that would wrap around a 5.5-level parking structure. The proposed project will conform to the Inclusionary Affordable Housing Requirements and Council Policy 600-27(A) criteria for the Affordable/In-Fill Housing Expedite Program which requires setting aside at least 10 percent of the units on-site for households with an income at or below 65 percent Area Median Income (AMI) for rental units. The applicant proposes to set aside a minimum of 20 percent (~~90 units~~) of the units on-site for affordable housing.

The 10.2-acre project site is located at 6850 Mission Gorge Road at the northwest corner of Mission Gorge Road and Old Cliff Road in the city of San Diego (APN 458-030-17-00). The project site is located in the RM 3-7 (multi-family residential) zone and is designated for multi-family residential development at 30-43 dwelling units/acre (du/ac) as identified in the Navajo Community Plan (NCP). The project site is within the Mobile Home Overlay Zone, CPIOZ Type B area, and FAA Part 77 Noticing Area for Montgomery Field.

The evaluation of environmental issue areas in this EIR concludes that the project would result in significant but mitigable direct impacts associated with **Land Use (Biological Resources), Transportation /Circulation, Historical Resources (Archaeology), Public Utilities, Noise and Biological Resources**. Implementation of the proposed Mitigation, Monitoring, and Reporting Program (MMRP) would reduce the environmental effects of the proposed project to below a level of significance with the exception of significant, unmitigated impacts related to traffic and circulation (direct and cumulative).

SIGNIFICANT MITIGATED IMPACTS

The following summary of mitigation measures have been incorporated into the project to reduce or avoid identified potentially significant impacts to a level below significance.

MITIGATION, MONITORING AND REPORTING PROGRAM

Land Use (Biological Resources)

Land use considerations were evaluated for consistency with the 2008 General Plan Update, Navajo Community Plan, and the City's Multiple Species Conservation Program (MSCP) Subarea Plan, City of San Diego Municipal Code, and the Montgomery Field Airport Land Use Plan. The proposed project would not conflict with the applicable goals, guidelines, objectives, recommendations, and policies associated with these plans. However, since development would occur adjacent to the City's Multi-Habitat Planning Area (MHPA), the project would need to comply with the Land Use Adjacency Guidelines contained in Section 1.4.3 of the MSCP Subarea Plan. Implementation of specific lighting, grading, noise, and fencing requirements, as described in the MMRP would reduce potentially significant indirect land use impacts (related to biology) to a level below significance.

Traffic and Circulation

The proposed project is located along Mission Gorge Road, between Old Cliff Road and Greenbrier Avenue, in the Navajo community planning area. The project is estimated to generate a net Average Daily Trips (ADTs) of 2,670 with 215 AM peak hour trips and 267 PM peak hour trips. With the removal of the existing 119 mobile homes as part of the redevelopment, the net trips generated by the proposed development is estimated to be 2,075 ADTs with 160 AM peak hour trips and 195 PM peak hour trips.

Due to degraded existing traffic conditions in the community, the additional traffic generated from the proposed project direct (near-term year 2010) and cumulative (horizon year 2030) would result in project-level significant impacts to the following intersection, roadway, and arterial segments for both Near Term (Year 2010) and Horizon Year (2030) scenarios:

Near Term (2010)

- Intersection of Mission gorge Road/Greenbrier Avenue/Project Access
- Friars Road between Rancho Mission Road and I-15 North Bound (NB) Ramps
- Friars Road between I-15 NB Ramps and I-15 South Bound (SB) Ramps
- Mission Gorge Road between Friars Road and Rainier Avenue
- Mission Gorge Road between Twain Avenue and Mission Gorge Place
- Mission Gorge Road between Mission Gorge Place and Fairmount Avenue
- Mission Gorge Road between Fairmount Avenue and Interstate West Bound (WB) Ramps

Horizon (2030) without Tierrasanta Boulevard and Santo Road Extensions plus Project

- Intersection of Mission Gorge Road/Greenbrier Avenue/Project Access
- Mission Gorge Road Between Greenbrier and Zion Avenue
- Mission Gorge Road between Zion Avenue and Friars Road
- Friars Road between Mission Gorge and Riverdale Street
- Friars Road between Riverdale Street and Santo Road
- Friars Road between Santo Road and Rancho Mission Road
- Friars Road between Rancho Mission Road and I-15 NB Ramps
- Friars Road between I-NB Ramps and I-15 SB Ramps
- Mission Gorge Road between Friars and Rainier Avenue
- Mission Gorge Road between Rainier Avenue and Vandever Avenue
- Mission Gorge Road between Vandever Avenue and Twain Avenue
- Mission Gorge Road between Twain Avenue and Mission Gorge Place
- Mission Gorge Road between Mission Gorge Place and Fairmount Avenue
- Mission Gorge Road between Fairmount Avenue and Interstate West Bound (WB) Ramps

Horizon (2030 with Tierrasanta Boulevard and Santo Road extensions plus Project

- Intersection of Mission Gorge Road/Greenbrier Avenue/Project Access
- Mission Gorge Road Between Greenbrier and Zion Avenue
- Mission Gorge Road between Zion Avenue and Friars Road
- Friars Road between Mission Gorge and Riverdale Street
- Friars Road between Riverdale Street and Santo Road
- Friars Road between Santo Road and Rancho Mission Road
- Friars Road between Rancho Mission Road and I-15 NB Ramps
- Mission Gorge Road between Friars and Rainier Avenue
- Mission Gorge Road between Rainier Avenue and Vandever Avenue
- Mission Gorge Road between Vandever Avenue and Twain Avenue
- Mission Gorge Road between Twain Avenue and Mission Gorge Place
- Mission Gorge Road between Mission Gorge Place and Fairmount Avenue
- Mission Gorge Road between Fairmount Avenue and Interstate WB Ramps

To mitigate significant direct (2010) and cumulative (2030) traffic impacts to a level below significance, the applicant is required to install a traffic signal at the intersection of Mission Gorge Road, Greenbrier Avenue, and the project's main access driveway. The new signal would be coordinated with the existing signal at Mission Gorge Road and Old Cliffs Road for improved traffic progression and operation. The applicant would also provide a median break, along the existing raised median, to facility full access to the project driveway at Mission Gorge Road; provide a 250-foot left turn pocket along the eastbound Mission Gorge Road approach for the inbound project traffic to turn left into the project driveway from eastbound Mission Gorge Road; and provide one inbound and one outbound lane along the project driveway.

Significant traffic impacts to seven of the roadway segments identified above in the near term (2010) and horizon year (2030) can not be mitigated to a level below significance, and therefore would be considered significant and unmitigated. These roadway segments are:

- Friars Road between Rancho Mission Road and I-15 NB Ramps
- Friars Road between I-NB Ramps and I-15 SB Ramps
- Mission Gorge Road between Friars and Rainier Avenue
- Mission Gorge Road between Rainier Avenue and Vandever Avenue
- Mission Gorge Road between Vandever Avenue and Twain Avenue
- Mission Gorge Road between Twain Avenue and Mission Gorge Place
- Mission Gorge Road between Mission Gorge Place and Fairmount Avenue

To mitigate potential impacts to these roadway segments would require the applicant to widen Friars Road from its current configuration of three lanes in each direction to four lanes; and widen Mission Gorge Road from its current configuration of two lanes in each direction to three lanes in each direction from the intersection of Mission Gorge Road/Friars Road to I-8. However, this mitigation would be infeasible since the applicant would need to acquire various rights-of-way and due to other physical constraints in the vicinity of I-15/Friars Road interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. The project will however be required to make a monetary fair-share contribution calculated at 5.5% towards the improvements to the seven roadway segments that are not built to the ultimate classification.

Air Quality

Emissions associated with the construction of the project were calculated and the analysis disclosed in the Air Quality Analysis (Recon, July 1, 2008). Maximum daily construction emissions were projected to be less than the applicable thresholds for all San Diego Air Pollution Control District (SDAPCD) criteria pollutants except for Reactive Organic Gases (ROG). The report concluded that this is primarily due to the Volatile Organic Compound (VOC) content of the architectural coatings (paints) that may be used during construction under a worst case scenario of a VOC content of 100 grams per liter for exterior architectural coatings and a VOC content of 50 grams per liter. To ensure that ROG emissions do not exceed standard threshold of 137 pounds per day; the applicant shall implement and record on the final grading and construction plans the conditions that VOC content of the exterior paint with a VOC content of 90 grams per liter and an interior paint to have a VOC content no greater than 50 grams per liter. Implementation of the required measure could mitigate potential air quality construction impacts to a level below significance.

Public Utilities (Solid Waste)

The proposed project could result in a significant impact to solid waste as a result of the proposed demolition of the existing structures, new construction, and operation. The

project would comply with the state requirements and City's Municipal Code to reduce solid waste generation by 50 percent. To ensure that the project would meet this goal, a Waste Management Plan (WMP) was prepared and reviewed by staff. Verification and approval of a final WMP to be implemented during demolition and construction is required since approximate construction debris can not be calculated at this time. The mitigation measure requires the preparation of a Waste Management Plan subject to approval by both the City's Development Services Department and the Environmental Services Department. That plan is required to address waste disposal issues for all stages of the proposed project (demolition, construction, and occupancy phases). The project is not anticipated to incrementally increase the solid waste generation beyond that identified by its zoning or land use designation and therefore impacts would not be considered cumulatively considerable. Cumulative and direct impacts to solid waste can be reduced to a level below significance through the implementation of the WMP, adherence to the 50 percent reduction mandate, and to the City's Municipal Code, including the City's Recycling Ordinance and the Construction and Debris Ordinance.

Cultural / Historical (Archaeological Resources)

The project site is located in a highly sensitive area that is known to contain significant prehistoric and historic resources. The western portion of the project site adjacent to the San Diego River may contain sensitive archaeological resources that may be impacted during project grading and construction and would be considered significant impact. Therefore specific mitigation measures would be implemented which would require archaeological monitoring during any initial grading or earth moving along the western property. The program would require that a qualified archaeologist and Native American Representative be present during construction activities. If cultural or historical deposits are discovered, excavation would temporarily stop to allow the archaeologist record, and recover materials. Implementation of the specific conditions in the project's Mitigation Monitoring and Reporting Program (MMRP) would therefore mitigate potential impacts to a level below significance.

Noise

In addition to the potential indirect noise impacts to the Least Bell's Vireo (sensitive bird species), as detailed in the Land Use/Biology section of the EIR, the project would also result in a potentially significant direct impact related to traffic noise (interior). An interior noise analysis is required to be prepared and submitted to the City for review to verify that interior noise is attenuated to a level below 45 dB(A).

Biological Resources

The project site is located adjacent to the San Diego River which is mapped within the City's Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA). The 10.22 acres site where development would occur is delineated as developed land containing no sensitive (MSCP covered) plant or wildlife species were detected on-site or known to occur with the project boundaries. However, the biological

survey report concluded that due to the proximity to San Diego River and MHPA, there is a potential for least Bell's vireo (federally and state listed endangered and MSCP covered) to occupy the riparian habitat along the San Diego River; and a potential for a Copper's Hawk (California Department of Fish and Game species of special concern and MSCP covered) to forage or nest within the mature pine trees located on-site. Therefore, to mitigate potential indirect and direct impacts to both sensitive bird species, specific measures shall be implemented to ensure that no grading, grubbing, or removal of habitat would occur within the identified breeding seasons and any potential indirect noise impacts during construction would be reduced or attenuated during their respective breeding seasons.

SIGNIFICANT UNMITIGATED IMPACTS

Transportation/Circulation

As described above, significant traffic impacts to roadway segments in the near term (2010) and horizon year (2030) can not be mitigated to a level below significance since it would be infeasible to widen Friars Road to four lanes in each direction (currently three lanes in each direction) and Mission Gorge Road to three lanes in each direction (currently, two lanes in each direction between Mission Gorge/Friars Road intersection and Interstate-8) to provide for the additional capacity and reduce the impacts because of the presence of various right-of-way and other physical constraints in the vicinity of I-15/Friars Road interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. The project would however be required to make a contribution only toward the improvements to the seven roadway segments that are not built to the ultimate classification.

ALTERNATIVES

NO PROJECT ALTERNATIVE

The No Project Alternative for the proposed Archstone – Mission Gorge project would be two-tiered: (1) maintenance of the site as a mobile home park and (2) future redevelopment of the site with a maximum of 444 multi-family units consistent with underlying land use designation in the Navajo Community Plan (Multi-family residential, medium-high density) and underlying zone (RM-3-7). Maintenance of the site as a mobile home site would be equivalent to the existing environmental setting. In this case, however, preservation of the site as a mobile home park cannot be assured; thus, it is reasonable to assume that there may be a future proposal to develop the site consistent with the community plan and zoning.

No Project/Retain Mobile Home Park

The No Project/Retain Mobile Home Park Alternative would be consistent with the Navajo Community Plan in that it would retain the Mobile Home Park Overlay and would eliminate the need for amending the Navajo Community Plan to remove the

Mobile Home Park Overlay. This alternative would fall short of a number of the project's objectives. This includes the objective of providing affordable multi-family residential housing, the objective of addressing the City's shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley would not be met and the objective of applying smart growth principles through the provision of high-density residential units in an urbanized location adjacent to public transportation, employment, and other public infrastructure and services. Furthermore, due to the fact that the site was developed for mobile home park use prior to many recent/current land use development requirements, existing daily operation of the mobile home park results in potential impacts to biological resources, geology/soils, hydrology/water quality, and solid waste disposal that would be avoided through design or mitigation measures incorporated into the proposed project. For these reasons, the No Project/Retain Mobile Home Park Alternative would not be considered the Environmentally Superior Alternative.

No Project/Redevelopment with Multi-family Residential

The No Project/Redevelopment with Multi-family Residential Alternative is a "no project" (i.e., a scenario where the proposed project is not approved) alternative which would generally result in the same level of impacts as the proposed project. However, in regard to the objective of providing affordable housing, this alternative may meet the objective to a lesser extent. Unlike the proposed project, which commits 20 percent of proposed on-site units to be set aside for low/moderate income residents, current regulations require only 10 percent. Thus, the No Project/Redevelopment with Multi-family Residential Alternative would not be considered the Environmentally Superior Alternative.

REDUCED PROJECT ALTERNATIVE

This alternative would reduce the number of units to a level that would avoid significant unmitigated impacts associated with the proposed project. Based on the traffic report, this would entail 200 multi-family units and a density of 19.5 du/acre, which would be below the density range associated with the land use designation and zoning. The lower yield in residential units would necessitate a different design for the project and the lower number of units would not support the cost of constructing a parking garage. Therefore, the Reduced Project Alternative would be designed as a "garden" product, with two- and three-story residential units constructed in several buildings over the entire site.

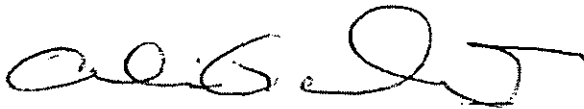
While the proposed project would exceed the City's Inclusionary Housing Ordinance by providing a minimum of 20 percent affordable units on-site, the Reduced Project Alternative would be unable to accommodate these affordable units on-site. This alternative would reach compliance with the City's Inclusionary Housing Ordinance by providing 10 percent affordable units off-site or by paying a fee to waive this requirement.

This alternative would fall short of a number of the project's objectives including the provision of affordable multi-family residential housing that exceeds the goals and objectives of the City of San Diego's Inclusionary Affordable Housing Regulations; assisting the City of San Diego in addressing its shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley; and implementing smart growth principles through the provision of high-density residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services.

The Reduced Project Alternative would represent the elimination of the proposed deviations for building and retaining wall height. By design, this alternative would eliminate significant roadway impacts under near-term and horizon year condition, both with and without the Tierrasanta Boulevard/Santo Road extensions. While other impacts would be similar to the proposed project, there would be a 55 percent reduction in the number of units and resulting in a reduction in impacts related to visual effects and community character, air quality, noise, public services, and utilities.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Reduced Project Alternative would be considered the environmentally superior alternative since traffic impacts would be not be considered significant and unmitigated.



Cecilia Gallardo, AICP
Assistant Deputy Director

July 30, 2008

Date of Draft Report

September 24, 2008

Date of Final Report

Analyst: Jarque

PUBLIC REVIEW

The following individuals, organizations, and agencies received a copy or notice of the draft EIR and were invited to comment on its accuracy and sufficiency.

Federal Government

Federal Aviation Administration (1)
Environmental Planning Division Naval Facilities (12)
U.S. Environmental Protection Agency (19)
U.S. Fish & Wildlife Service (23)
U.S. Army Corps of Engineers (26)

State Government

California Department of Transportation Planning - CALTRANS (31)
California Department of Fish & Game (32)
California Environmental Protection Agency (37A)
Department of Toxic Substance Control (39)
Resources Agency (43)
Regional Water Quality Control Board: Region 9 (44)
Air Resources Board (49)
Office of Attorney General (50)
Office of Planning and Research (57)

County Government

Air Pollution Control District (65)
County Water Authority (73)
Department of Environmental Health (75)

City Government

Mayor's Office (91)
Councilmember Peters, District 1
Councilmember Faulconer, District 2
Councilmember Atkins, District 3
Councilmember Young, District 4
Councilmember Maienschein, District 5
Councilmember Frye, District 6
Councilmember Maddafer, District 7
Councilmember Hueso, District 8
Library Department – Government Documents (81)
Benjamin Branch Library (81-O)
Mission Valley Branch Library (81R)
Werner Landry, Development Services Department (82)
Lisa Wood, Environmental Services Department (93A)
Bob Medan, Fire Plans Officer (MS 401)

Jeff Harkness Parks and Open Space (MS 35)
Thomas Bui, Engineering (MS 501)
Jim Quinn, Geology (MS 401)
Jeff Oakley, Landscape (MS 501)
Billy Church, Planning (MS 501)
Jim Lundquist, Transportation Development (MS 501)
Janet King, Wastewater (MS 922)
Mahomood Keshavarzi, Water Review (MS 910D)
Cheryl Robinson, Facilities Financing (MS 606F)
Dan Monroe, Long Range Planning (MS 4A)
Jeanne Krosch, MSCP (MS 5A)
Tony Gangitano, MMC (77A)
Frankie Murphy, Assistant Fire Marshall
Officer Dan Sayasane, SDPD
San Diego Housing Commission
Jeff Peterson, Development Project Manager

Other Interested Parties

Union Tribune City Desk
SANDAG
San Diego County Regional Airport Authority (110)
San Diego Transit Corporation (112)
San Diego Gas & Electric (114)
Metropolitan Transit Board (115)
San Diego Unified School District (125)
San Diego City Schools (132)
Environmental Health Coalition (169)
Environmental Law Society (164)
Sierra Club (165)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
Stuart Hurlbert (172)
Center for Biological Diversity (176)
Wetland Advisory Board (91A)
Endangered Habitats League (182A)
Historical Resources Board (87)
Carmen Lucas (206)
Dr. Jerry Schaefer (209)
San Diego State University, South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Louie Guassac (215A)
Clint Linton (215B)

San Diego County Archaeological Society (218)
 Native American Heritage Commission (222)
 Kumeyaay Cultural Repatriation (225)
 Native American Distribution *
 Friends of Adobe Falls (335)
 Navajo Community Planners, Inc. (336)
 Navajo Community Service Center (337)
 San Carlos Area Council (338)
 San Diego River Conservancy
 San Diego River Foundation / Coalition
 Del Gardens Senior Social Club (339)
 Mission Trails Regional Park (341)
 Paul Robinson, Hecht, Solberg, Robinson, Goldberg
 Karen Ruggles, KLR Planning
 Bobbi Herdes, RECON Environmental
 Mission Valley Village*
 Homer Barrs*
 Margaret Lurry*
 Sara Lentz*
 John and Mary McGovern*
 John Schwabecher*
 C. / J. Mulgrew*
 Dona A Fenter*
 Helen Savage*
 Gloria Monsalve*
 John Dement*
 Chuck McCoy*
 William and Katherine Pokrant*
 William Cox*
 Cornelia Mejia*
 Rober J. Marlborough Sr.*
 Barbara Pennington*
 Roberta McGuire*
 Beverly Thompson*
 Murray and Celia Zeilickman*
 Elain W. Lane*
 Janice Wolstencroft*
 Richard and Nancy Mulroney*
 Anthony J Albanese*
 P. Bonventre*
 Paul and Doris Blunck*
 Maragaret Fitzsimmons*
 Scott and Mary L Thomas*
 Nancy Nelson*
 Bruce and Jackie Demers*

Ralph Kraft*
Jan Vandal*
Mary Lou Pixley*
Dennis Esh*
Dwight R. Larson*
Thomas Wonner*
Delia Tulio*
Pauline and William Johnstone*
Josephine Tufo*
Marian Christopher*
K Murch/A Turner*
James Allen*
Rex Bryant*
Richard Schneider*
Joseph J Simas*
Don and Carol Schmidt*
Mark and Carolyn Gunnon*
Betty M Neill*
Art Hanks*
Lorraine Sheibley*
Mary Quindoy*
Elva Eastman*
Bill Hardasty*
Elvia Idano*
Don Johnson*
Ed Spies*
Linda Prentice/R. Clay*
Keith Bond*
Bryan/Leslie Kern*
Ann/Dorsa Garrison*
Joan K. Rudin*
Susan Seeley*
Ralph/Alberta Bast*
Mary Ellen Troge*
Tom/Linda Belerie*
Mary Lynn Morris*
Heather Manues*
James Weighill*
Dorothy Page*
S.E. Williams*
Doris Cernestisch*
Joseph/Marilyn Schmidt*
Richard T. Abbey Jr.*
Thelma D. English*
Dane Grebles*

Linda B. Conlin*
Larry Franzen*
Grover Churchill*
Bruce Dunn*
Lawrence Johnson*
Cynde McDairmaint*
Zoanne/Robert Richardson*
Sylia Miska & Monica Bennet*
S. Solana*
H. Bundon*
Kathleen Ortwein*
B. Smedley*
Kazyji Yamate-Fischer*
Goron and Mary Peterman*
Homer and Virginia Barrs*
John Hopper*
Mary Jo Kelley*
Francis and Ventura Welch*
Ron and Nancy Dunbar*
Rose L. Goodner*
Patricia Schulz*
Howard Newman*
Ba Pepper*
Ronald Mills*
Doris J. Melvin*
Dixie Smit*
Caolyn Granrud*
Pat Schamel*
Jon Schwabecher
Malinda Gilheath
Alice Marie Burke
Tom Garrison
Barbara Spitzer
Donna M. Boyle
Harold O. McNeil, Esq.
Jere and Betty Robinson
Alma Blauvelt
Don and Lou Ann Prock
Joann Marshall
Robert E. Beck
Stephanie Kilbride
Tom and Ursula Jennings
Carol Dunbar
Alin and Randy Merkel
Cyntina J. Steed

Edward J. Dickinson
Hoover Schwartz
James Tomsovic
Judy Eppler
Pam Daron and NG Stanley
Robert and Elma Hoobe
Anna Paige
Ardell A. Anderson
Barbara Carlton
Donna Wright
Dr. JL Thomas
Henry Bundon
Kenneth and Lilly Chestnut
Naomi R. Berg
Rose M. Steed
Sam Douglass
Sandy LaMont
Thomas Jacques
Tom McMillen
AD McGowan
Adam Bolio
Barry and Corinne Smedley
Denise Horan
Donna D. Tofte
George and Shirley Walk
John Dale Shive
Judith Sharp
Julie McDowell
K. Yamate Fischer
Lasha Scheumack
Lorraine Sheibley
Mark Naiman
PS Morebello
Shirley Preddy
Virginia Finley
Anne Lee
Carol Dunbar
Lee Campbell
R. Dunbar
Katheryn Rhodes
Marie C. Ostwald
Yvette Stark
John and Denielle Humphrey
Marti Emerald
Barbara Sager

Kathy Costigon
Scotty Basr
Jarvis Ross
Gloria Hanson
Tracy Quindoy
Nancy Johnson
Robert Leif
Gladys Palasi
Richart Winter
Elisha Blatt
Leslie Ragan-Davis

** Residents of Mission Valley Village – Public Notice only.*

RESULTS OF PUBLIC REVIEW

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the EIR were received during the public input period. The letters and responses follow.

Copies of the EIR, the Mitigation Monitoring and Reporting Program, and any technical appendices may be reviewed in the office of the Development Services Department, or purchased for the cost of reproduction.

ARCHSTONE – MISSION GORGE LETTERS OF COMMENT AND RESPONSES

The following letters of comment were received from agencies, organizations, and individuals during the Public Review period of the Draft EIR. A copy of each comment letter along with corresponding staff responses has been included. Many of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide responses as appropriate as a courtesy to the commenter. During the Draft EIR public review period, several comments resulted in changes to the Final EIR text. These changes to the text are indicated by strikeout (deleted) and underline (inserted) markings. Revisions to the Final EIR are intended to correct minor discrepancies and provide additional clarification. The revisions do not affect the conclusions of the document.

Letter No.	Author	Address	Date	Representing
STATE				
a*	Roberts, Terry	1400 10 th Street P.O. Box 3044 Sacramento, CA 95812	09/16/08	California Office of Planning and Research State Clearinghouse and Planning Unit
b*	Armstrong, Jacob M.	4050 Taylor Street, MS 240 Sa Diego, CA 92101	09/17/08	California Department of Transportation (Caltrans), District 11
A	Khachatourians, Eileen M.S.	5796 Corporate Avenue, Cypress, CA 90630	09/04/08	California Department of Toxic Substances Control (DTSC)
B	Schlitt, Paul	4949 Viewridge Avenue, San Diego, CA 92123	09/08/08	California Department of Fish and Game (CDFG) – South Coast Region
LOCAL				
C	Royle, James W.	P.O. Box 81106, San Diego, CA 92138	08/11/08	San Diego County Archaeological Society
D	Collins, Debbie AICP	8315 Century Park Court CP21E, San Diego, CA 92123	08/28/08	SDG&E
ORGANIZATIONS / INDIVIDUALS				
E	Barrs, Homer	6892 Mission Gorge Road, San Diego, CA 92120	09/15/08	Mission Valley Village MHP
F	Campbell, Lee	email	09/11/08	Himself

G	Carlton, B.J.	4773 Greenbrier Ave. San Diego, CA 92120	09/09/08	Himself
H	Dickinson, Edward J.	6880 Cartwright Street, San Diego, CA 92120	09/12/08	Himself
I	Eastman, Elva	6852 Mission Gorge Road, San Diego, CA 92120	09/11/08	Herself
J	Esh, Dennis J.	6828-1/2 Mission Gorge Road, San Diego, CA 92120	08/26/08	Himself
K	Hanson, Gloria	N/A	09/04/08	Herself
L	Hooks, Robert & Elma	474 Greenbrier Ave., San Diego, CA 92120	08/15/08	Themselves
M	Quindoy, Mary	N/A	09/10/08	Herself
N	Steed, Cynthia J. & Rose M.	6802 Newberry Street, San Diego, CA 92120 4819 Greenbrier Ave San Diego, CA 92120	09/02/08	Themselves
O	Thomas, Dr. J.L.	4791 Greenbrier Ave., San Diego, CA 92120	08/21/08	Himself
P	Wilson, Linda J.	77 92 Mockingbird Drive San Diego, CA 92123	09/12/08	Herself

*These letters were received after the close of the public review period (September 12, 2008) and have thus been identified as lowercase a and b, and incorporated into the final document.

LETTER a



ARNOLD SCHWARZENEGGER
GOVERNOR

September 16, 2008

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

Anne B. Jarque
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Archstone - Mission Gorge
SCH#: 2008021145

Dear Anne B. Jarque:

- a-1] The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 12, 2008, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

- a-1 Comment noted. This letter acknowledges that the proposed project has complied with the State Clearinghouse review requirements for environmental documents pursuant to CEQA. As indicated in comment letters b, A and C (see below), three state agencies submitted comments on the Archstone - Mission Gorge EIR directly to the City of San Diego. These include: the Department of Transportation (Caltrans) District 11 (letter b); the Department of Toxic Substances Control (letter A); and the Department of Fish and Game (letter B). No other state agencies submitted comments on the EIR.

LETTER

RESPONSE

LETTER b

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

District 11
4050 Taylor Street, MS 240
San Diego, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299



*Flex your power!
Be energy efficient!*

September 17, 2008

11-SD-15
PM 6.82
TIS JN 15237

Ms. Anne B. Jarque
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

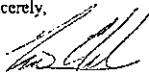
Dear Ms. Jarque:

The California Department of Transportation (Caltrans) has reviewed the Archstone Mission Gorge project (SCH 2008021145) DEIR. Caltrans has the following comments:

- b-1 • For Exhibit 3, Page 10, the Existing Lane Configuration for Friars Road/I-15 SB needs to be corrected to show three through lanes and one left lane. There is no "right turn only" lane at this intersection. The right turn drops off to access NB I-15 from westbound Friars Rd. Consequently, although the volume is shown as zero, the LOS computation report, Appendix C page 2-23, should not include a "right turn" lane, because it may cause an error on the signal phasing.
- b-2 • The Existing Lane Configuration for Friars Road/I-15 NB needs to be corrected to show only one lane merging to westbound Friars Road. The two lanes on the loop already merge into one lane prior to merging to Friars Road. These two lanes do not impact the computation but need to be removed to show the existing condition.

If you have any questions, please contact Jacob Armstrong, Development Review Branch, at (619) 688-6960.

Sincerely,


JACOB M. ARMSTRONG, Chief
Development Review Branch

"Caltrans improves mobility across California"

b-1 Exhibit 3 of the EIR Appendix D, Traffic Impact Analysis (TIA), has been revised to show the refined lane configuration for Friars Road/I-15 SB. These changes do not affect the signal phasing or traffic level of service (LOS) calculations contained in the TIA or EIR traffic analysis Section 4.2. The right turn movement at this location is coded as a free right turn lane in the TIA and is thus not considered part of the intersection.

b-2 Exhibit 3 of the EIR Appendix D, Traffic Impact Analysis (TIA), has been revised to show the refined lane configuration for Friars Road/I-15 NB. These changes do not affect the signal phasing or LOS calculations contained in the TIA or EIR traffic Section 4.2. There are two free right turn lanes at the Friars Road/I-15 NB loop ramp that merge into one but were coded in the TIA as free. It would not make any difference if it was coded as two- or one-lane because there is no delay associated with these free movements.

LETTER A



Department of Toxic Substances Control



Linda S. Adams
Secretary for
Environmental Protection

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

September 4, 2008

Ms. Anne B. Jarque, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR ARCHSTONE – MISSION
GORGE PROJECT (SCH# 2008021145)

Dear Ms. Jarque:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of a Supplemental EIR for the above-mentioned project. The following project description is stated in your document: "The 10.2 acre project site is located at 6850 Mission Gorge Road at the northwest corner of Mission Gorge Road and Old Cliff Road in the city of San Diego (APN 458-030-1700). The project site is located in the RM 3-7 (multi-family residential) zone and is designated for multi-family residential development at 30-43 dwelling units/acre (du/ac) as identified in the Navajo Community Plan (NCP). The project does not propose a change to the existing RM-3-7 zone. The project site is within the Mobile Home Overlay Zone, CPIOZ Type B area, and FAA Part 77 Noticing Area for Montgomery Field."

On April 4, 2008, DTSC commented on the Notice of Preparation for the above named project. Based on the review of the submitted document DTSC has the following comments:

- A-1 1) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.7 below for more information.

♻️ Printed on Recycled Paper

- A-1** The potential for hazardous materials affecting public health and safety within the Archstone – Mission Gorge project area was evaluated in a Phase I Environmental Site Assessment (ESA) prepared by Blackstone Consulting in late 2006. The assessment utilized proper investigation and sampling in accordance with industry standard ASTM Standard Practice E1527-05, which included a review of regulatory agency databases, records review, limited visual site reconnaissance, and review of site history to identify potential environmental concerns. As stated in Section 4.14.3.1 of this document, the Phase I ESA concluded that there are no contaminated sites within the vicinity of Archstone – Mission Gorge that require remediation. If, during construction/demolition activities, soil or groundwater contamination is encountered; the applicant would stop work, request cleanup oversight by the DTSC, and would be subject to a Voluntary Cleanup Agreement (VCA).

LETTER

RESPONSE

Ms. Anne B. Jarque
September 4, 2008
Page 2

- A-2 2) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.
- A-3 3) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulation's and policies.
- 4) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- 5) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 6) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.
- 7) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

A-2 See Response to Comment **A-1**.

A-3 The ESA prepared for the proposed project acknowledges that, because of the age of the various structures located within the project site, there is a potential for personnel to be exposed to lead-based paint (LBP) and/or asbestos containing materials (ACMs) during demolition. The State of California and County and City of San Diego have established regulations to ensure that hazardous materials, including ACMs, lead-based paints and products, mercury, and other hazardous materials are abated in compliance with environmental regulations and policies.

Relative to ACMs, prior to any demolition of assumed ACM areas, the County of San Diego requires that a site surveillance be performed by certified asbestos consultant or technician to test suspect materials. If ACMs are found present, a registered asbestos abatement contractor would be hired for proper disposal of any hazardous material prior to demolition, as required by the County of San Diego. Furthermore, a letter of "Notification of Asbestos Renovation or Demolition Operations" would be delivered to the City of San Diego as per City ordinance. If other hazardous materials are encountered during demolition procedures, standard measures will be taken to comply with State and local regulations.

Therefore, as discussed in Section 4.14.3.2 of this document, project compliance with all mandatory standards and regulations pertaining to ACM and LBP (presurvey, handling, dust-suppression, and disposal) would ensure that ACM and LBP impacts would not be significant.

Ms. Anne B. Jarque
September 4, 2008
Page 2

- 2) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.
- 3) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulation's and policies.
- A-4 4) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- A-5 5) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- A-6 6) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.
- A-7 7) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

A-4 See Response to Comment A-1.

A-5 See Response to Comment A-3. In addition, included in the Air Quality Technical Report prepared for the project (Appendix E) is a health risk assessment.

A-6 See Response to Comment A-1.

A-7 Comment noted. As presented in Section 4.14.1 of the EIR, as part of the Phase I Environmental Site Assessment, a variety of appropriate databases were consulted to help identify "recognized environmental conditions" (RECs) at or potentially affecting the project site. These sources included: NPL, CERCLIS, NFRAP, RCRA TSD, RCRA COR, RCRA GEN, RCRA NLR, ERNS, CalSites and Cortese Databases, Spills-1990 California Regional Water Quality Control Board), SWL, LUST, San Diego County Department of Environmental Health, and REG UST/AST.

Review of the regulatory database report and San Diego County Department of Environmental Health information indicated that that there are no cases involving unauthorized releases associated with the project site.

LETTER

RESPONSE

000024

Ms. Anne B. Jarque
September 4, 2008
Page 3

A-8 8) In future CEQA documents please provide the contact person's e-mail address.

If you have any questions regarding this letter, please contact me at (714) 484-5349 or
EKhachat@dtsc.ca.gov.

Sincerely,



Eileen Khachatourians, M.S.
Project Manager
Brownfields and Environmental Restoration Program - Cypress

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814

CEQA# 2259

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A-8 The complete contact information for the EIR was presented in the PUBLIC NOTICE OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, which was distributed with the Draft EIR and was placed on the City's web site. The requested information is included in the Notice of Completion sent to the State Clearinghouse and is posted on the CEQAnet web site. If the project should change in the future requiring additional environmental review, previous project titles will be noted.

LETTER

RESPONSE

LETTER B

B_FromCITY_State_CDFG_090808.txt
 From: Paul Schlitt [mailto:PSchlitt@dfg.ca.gov]
 Sent: Monday, September 08, 2008 12:49 PM
 To: Jarque, Anne
 Cc: Patrick.Gower@fws.gov
 Subject: Archstone-Mission Gorge Project No. 142570

Subject: Comments on the Draft Environmental Impact Report for the Archstone Mission Gorge Project, Project No. 142570, SCH No. 2008021145; DSO Staff: Anne B. Jarque, Environmental Planner

Dear Ms. Jarque:

The California Department of Fish and Game (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) dated July 30, 2008. We are generally in agreement with the proposed mitigation measures for the project and analysis provided within the CEQA document. We have four comments that should be addressed prior to finalization of the EIR.

- B-1 1. Mitigation language provided on Sections 4.1.5.3 and 4.7.3.3 of the DEIR partially address impact concerns for resident, migratory and other bird species (e.g., raptors). The City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan does not provide take for non-MSCP covered species, including many migratory avian species. In order to comply with sections 3503 and 3503.5 of the Fish and Game code and ensure no direct impacts to active avian nests, construction activities (including vegetation clearing and grubbing) within or adjacent to avian nesting habitat should occur outside of the avian breeding season (January 15 to August 31), or earlier if a qualified biologist demonstrates to the satisfaction of the Department that all nesting activities on site are complete. Additionally, we recommend that pre-construction surveys be performed by a City-approved biologist to determine the presence or absence of nesting birds within 300-feet (500-feet for raptors) of the construction area prior to the initiation of construction-related activities if construction (other than vegetation clearing and grubbing) should occur during the breeding season. The pre-construction surveys should be conducted within 10 calendar days prior to the start of construction, and the results submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected, a City-approved biologist should prepare and submit to the City for review and approval a mitigation plan to ensure that disturbance of breeding activities is avoided. The biologist should implement the City-approved mitigation plan to the satisfaction of the City.
- B-2 2. Two breeding dates are referenced for the least Bell's vireo in Section 4.1.5.3 (pages 4.1-53 and 4.1-54). Please revise accordingly to reflect nesting period referenced in Appendix A of the City's MSCP Subarea Plan.
- B-3 3. Please correct the typographic error on page 4.7-10 (i.e., mitigation language for Cooper's hawk) that identifies least Bell's vireo (*Vireo bellii pusillus*) instead of requirements for the Cooper's hawk (*Accipiter cooperii*).
- B-4 4. The No Project/Retain Mobile Home Park alternative discussion within Section 9.2.7.1 of the DEIR states, "Thus the potential for impacts to biological resources associated with this alternative would be worse than the proposed project". The DEIR did not provide any substantive facts to support such a conclusion. Unless there is substantial evidence to the contrary, we would suggest avoiding speculation or unsubstantiated opinion in deriving such a conclusion.

We appreciate the opportunity to comment on the DEIR for this project and to assist the City in further minimizing and mitigating project impacts to biological resources. If you should have any questions, please contact the Department.

Sincerely,

Paul Schlitt

Page 1

- B-1 As stated in the project biology report (Appendix J), avian species observed on-site are protected under the Migratory Bird Treaty Act (MBTA), which prohibits, unless permitted by regulations, the pursuit, hunting, taking, capture, killing, possession, sale, purchase, transport, or export of any migratory bird or any part, nest or egg of that bird. A standard permit condition states that the granting of a project permit does not allow the violation of any state or federal laws. The MMRP includes on-site biological monitoring of the site. Compliance with the MMRP is overseen by the City's Mitigation Monitoring Coordination (MMC) section.
- B-2 The breeding dates listed on page 4.1-53 have been revised such that they are consistent with the dates listed on page 4.1-54 and with the dates listed in Appendix A of the City's MSCP Subarea Plan.
- B-3 The typographical error on page 4.7-10 has been revised to reflect mitigation for the Cooper's hawk rather than the least Bell's vireo.
- B-4 As discussed in Section 4.8.1 of the EIR, currently, runoff generated on-site is conveyed through on-site roads and concrete-lined open ditches to the property boundary, discharged via the outfalls onto the adjacent golf course property and eventually into the receiving waters of the San Diego River approximately 80 feet west of the property. By incorporating low-impact development site design, source control, priority project category, and treatment control BMPs, the proposed project would improve the quality of the runoff into the San Diego River, thereby enhancing the quality of the habitat.

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LETTER

RESPONSE

B_fromCITY_State_CDFG_090808.txt

Paul Schlitt
Staff Environmental Scientist
CA Dept. of Fish and Game
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123

Phone (858) 637-5510
Fax (858) 467-4299
pschlitt@dfg.ca.gov

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LETTER C



San Diego County Archaeological Society, Inc.

Environmental Review Committee

11 August 2008

To: Ms. Anne B. Jarque
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
Archstone Mission Gorge
Project No. 142570

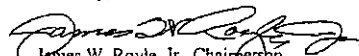
Dear Ms. Jarque:

I have reviewed the historical resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

C-1 Based on the information contained in the DEIR and the historical resources survey report for the project, we agree with the impact analysis and mitigation measures as defined in the DEIR.

SDCAS appreciates being afforded this opportunity to participate in the public review period for this DEIR.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: RECON
SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (619) 538-0035

C-1 Comment noted.

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A Semptra Energy utility

Debbie Collins, AICP
Senior Environmental Specialist
8315 Century Park Court
CP21E
San Diego, CA 92123
(T) 858-654-1239 (F) 858-637-3700

LETTER D

August 28, 2008

Anne Jarque, Environmental Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Archstone – Mission Gorge Draft EIR (Project No. 142570)

Dear Ms. Jarque:

San Diego Gas & Electric (SDG&E) appreciates the opportunity to review and comment on the Draft Environmental Impact Report EIR) for the above referenced project. The proposed project would replace an existing 119 unit mobile home park with a 444 unit multi family apartment complex.

D-1 The Draft EIR does not include any discussion of gas and electric facilities. However, the site plan (Figure 3-1) does include a note along the northern project boundary stating "Existing 12' gas and electric easement to be removed". Since there appears to be one or more SDG&E easements within the project area, the developer will need to site their improvements so as to avoid unacceptable impacts to the(se) easement(s), or work with SDG&E to move or abandon the easement(s). Please contact SDG&E Land Management Representative Brian Swanson in the Real Estate & Land Services department (858) 654-1249 to further discuss easement restrictions.

The following information is provided for your consideration:

- Any changes in grade shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities.
- Project grades shall be coordinated to assure clearances as required by California Public Utilities Commission General Order 95.
- Any temporary or permanent relocation of facilities or placement of facilities underground and/or associated temporary outages shall be completed at the cost of the project developer.
- If proposed, SDG&E will not authorize use of its rights-of-way for trail purposes by HOA's or private individuals. In the event the City will have ownership of trails, SDG&E will enter into Consent to Use Land Agreement, which will require indemnification of SDG&E by the City.

D-1 Comment noted. The applicant will coordinate with SDG&E regarding the on-site easement restrictions.

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Page 2 of 2

- Landscaping, revegetation and/or habitat enhancement plans for the project shall not inhibit SDG&E's access to facilities for purposes including, but not limited to, construction, upgrading, repair, operation or maintenance.

SDG&E appreciates the opportunity to comment on this Draft EIR. If you have any questions feel free to contact me at 858-654-1239.

Sincerely,

Debbie Collins
Debbie Collins, AICP
Land Planner

Cc: Brian Swanson, Land Management Representative
Ellis Jones, Electric Distribution Planning

LETTER E

Review and rebuttal to ERI # 142570

Summated by

Homer Barrs

President Of Mission Valley Village MHP

6892 Mission Gorge Rd

San Diego, Ca. 92120

Home Ph # 619-546-7636

e-mail hbarrs@cox.net

E-1 Includes Two Photos of Archstone's Hotel Circle North

Photo Archstone HCN 1 should used to compare with Figure 4.10-8 it shows that the actual size and Height for comparison. The after photo would be accurate if the height was going to be 31'

Photo Archstone HCN 2 is for comparison with Figure 4.10-6 the same 31' high was used in this comparison

Before you even consider the Archstone Mission Valley Project, look at the wording of the Mobile Home overlay Zoning law:

(O-93-160) ORDINANCE NUMBER O-17950 (NEW SERIES)

ADOPTED ON AUGUST 2, 1993

AN ORDINANCE AMENDING CHAPTER X, ARTICLE

I, DIVISION 10, OF THE SAN DIEGO

MUNICIPAL CODE BY AMENDING SECTIONS

101.1001 AND 101.1002 RELATING TO

MOBILE HOME PARK OVERLAY ZONE.

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

Section 1. That Chapter X, Article I, of the San Diego Municipal Code be and the same is hereby amended by amending Sections 101.1001 and 101.1002 to read as follows:

SEC. 101.1001 MOBILE HOME PARK OVERLAY ZONE

A. PURPOSE AND INTENT

1. The purpose of the Mobile Home Park Overlay Zone is to provide adequate sites for mobile homes consistent with the City's goal of accommodating alternative housing types. In attaining this goal it is intended that the zone may be applied as a means of preserving existing mobile home parks and their supply of mobile home spaces and to reserve vacant sites designated for mobile home park development in community plans. The Mobile Home Park Overlay Zone is intended to treat the development of mobile homes and mobile home parks as traditional housing. In this regard the zone utilizes the Planned Residential Development legislation to regulate the planning and development of individual mobile homes as well as mobile home parks.

2. The Mobile Home Park Overlay Zone may be applied in any zone in which residential uses are permitted. The density of mobile home development shall be that provided by the underlying zone, the Progress Guide and General Plan for The City of San Diego or the adopted community plan, whichever provides for the lowest density.

Since this ordinance was enacted in 1993, what has changed? The supply of mobile home spaces within the city of San Diego *has not increased*. As land prices have risen, owners of existing mobile home parks are under increased pressure to sell to developers like Archstone, who recognize only the profit to be made from development. This proposed development is *exactly* what the Mobile Home Overlay was meant to protect. Does this project even warrant consideration?

E-1 The proposed building heights are analyzed in Section 4.10 of the EIR. Photographic simulations of the proposed project from the perspective of motorists using the public roadways of Greenbrier Avenue and Mission Gorge Road are provided in Figure 4.10-6 and Figure 4.10-8 respectively. The location and perspective (angle of view) for each of these figures is provided in EIR Figure 4.10-5. As stated in the EIR, these locations were selected to represent typical motorists' views from adjacent public roadways and take into consideration roadway speed and alignment. Standard assumptions regarding motorist viewing behavior are represented; in that motorists typically look straight ahead or slightly to one side, as opposed to looking directly perpendicular (or at a 90-degree angle) from the roadway (thus taking their eyes off the road). The photosimulations were generated through computer modeling of three-dimensional engineering drawings to accurately reflect building features, including height.

By comparison, photographs 1 and 2 contained in the comment letter potentially reflect a pedestrian viewer in close proximity to a four-story building, or possibly a motorist as it approaches and enters the apartment complex. Because the viewer in these photographs is in closer proximity than the viewer in the EIR photosimulations, the building heights may appear taller.

LETTER E

Review and rebuttal to ERI # 142570

Summated by

Homer Barrs

President Of Mission Valley Village MHP

6892 Mission Gorge Rd

San Diego, Ca. 92120

Home Ph # 619-546-7636

e-mail hbarrs@cox.net

Includes Two Photos of Archstone's Hotel Circle North

Photo Archstone HCN 1 should be used to compare with Figure 4.10-8 it shows that the actual size and height for comparison. The after photo would be accurate if the height was going to be 31'

Photo Archstone HCN 2 is for comparison with Figure 4.10-6 the same 31' high was used in this comparison

Before you even consider the Archstone Mission Valley Project, look at the wording of the Mobile Home overlay Zoning law:

(O-93-160) ORDINANCE NUMBER O-17950 (NEW SERIES)
ADOPTED ON AUGUST 2, 1993
AN ORDINANCE AMENDING CHAPTER X, ARTICLE
1, DIVISION 10, OF THE SAN DIEGO
MUNICIPAL CODE BY AMENDING SECTIONS
101.1001 AND 101.1002 RELATING TO
MOBILE HOME PARK OVERLAY ZONE.

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

Section 1. That Chapter X, Article 1, of the San Diego

Municipal Code be and the same is hereby amended by amending Sections
101.1001 and 101.1002 to read as follows:

SEC. 101.1001 MOBILE HOME PARK OVERLAY ZONE

E-2 A. PURPOSE AND INTENT

1. The purpose of the Mobile Home Park Overlay Zone is to provide adequate sites for mobile homes consistent with the City's goal of accommodating alternative housing types. In attaining this goal it is intended that the zone may be applied as a means of preserving existing mobile home parks and their supply of mobile home spaces and to reserve vacant sites designated for mobile home park development in community plans. The Mobile Home Park Overlay Zone is intended to treat the development of mobile homes and mobile home parks as traditional housing. In this regard the zone utilizes the Planned Residential Development legislation to regulate the planning and development of individual mobile homes as well as mobile home parks.

2. The Mobile Home Park Overlay Zone may be applied in any zone in which residential uses are permitted. The density of mobile home development shall be that provided by the underlying zone, the Progress Guide and General Plan for The City of San Diego or the adopted community plan, whichever provides for the lowest density.

Since this ordinance was enacted in 1993, what has changed? The supply of mobile home spaces within the city of San Diego *has not increased*. As land prices have risen, owners of existing mobile home parks are under increased pressure to sell to developers like Archstone, who recognize only the profit to be made from development. This proposed development is exactly what the Mobile Home Overlay was meant to protect. Does this project even warrant consideration?

E-2 As identified in Sections 2.6.2.2, 2.6.5.2 and 2.6.5.5 of the EIR, the current Municipal Code pertaining to the Mobile Home Park Overlay Zone (MHPOZ) contains procedures for the discontinuance and conversion of existing mobile home parks and references applicable supplemental procedures contained in the Municipal Code's Mobile Home Park Discontinuance and Tenant Relocation Regulations. The MHPOZ was added/amended by ordinance O-18451 to the City's Municipal Code in 1997, effective January 2000, as Article 2: Overlay Zones, Division 7: Mobilehome Park Overlay Zone. The stated purpose of the MHPOZ is "to preserve existing mobile home park sites, consistent with the City's goal of accommodating alternative housing types, and to provide supplemental regulations for the discontinuance of mobilehome parks and the relocation of the mobile home park tenants" (Municipal Code, Section 132.0701).

The proposed project thus warrants consideration under the MHPOZ given compliance with the procedures referenced in the MHPOZ for discontinuance of the existing mobile home park, in concert with the proposed site development permit (SDP) and community plan amendment CPA to remove the MHPOZ from the project site. As stated in the MHPOZ regulations, any proposal to discontinue a mobile home park that is located within this zone is subject to the supplemental Mobilehome Park Discontinuance and Tenant Relocation Regulations contained in the Municipal Code, Sections 143.0610 to 143.0640 (adopted by ordinance O-18451 1997, effective January 2000), and requires an SDP.

The Allied Gardens community plan shows this parcel as a mobile home park with medium density of 119 homes. This is the lower density and should prevail as stipulated in the Mobile Home Overlay ordinance.

E-3 The people who moved into Mission Valley Village did not do so imprudently. Before moving in four years ago, when I went to the recorders office to see the zoning map for this park. It was zoned RM3-1 medium. The clerk explained this meant residential -medium density or 12 to 15 homes per acre. The clerk also explained this park also had a Mobile Home Park Overlay (MHPOZ) ordinance to protect the use for a mobile home park.

E-4 Since being sold to Archstone, the zoning on this parcel has mysteriously been changed to RM3-7. All of my attempts to find out when and how the RM3-1 zone was changed to RM3-7 have failed. I have been told this change is either propriety information, or that it was unavailable.

E-5 Archstone's project at 6850 Mission Gorge Rd. presently known as Mission Valley Village violates several city building codes for which they are seeking waivers. This project makes changes to the current 100 year flood plan lines, building permits limits, zoning, set back ordinances, height restrictions, traffic flow allowances, water usage, the views of over a hundred of the neighboring homes. This project disturbs the natural flow of air through the area and would dramatically increase the carbon monoxide generated in this location. Finally this EIR is so full of deliberate misrepresentations and bias favoring the project as to make the entire document suspect as to its entire content and should be deemed unusable.

View and Air Flow

Archstone pictures that were professionally done and look real nice, are themselves deliberately misleading as to the height of the buildings making them to seem much lower than the really are. We have included some actual photos of the Archstone Apartments that are the same height and design as this project. Compare the two photos or better yet drive down to 1440 Hotel Circle North stand about 80 feet away. This is the view homes directly across Mission Gorge Road will be seeing.

Over 100 homes across Mission Gorge Road from this parcel presently have a view of the hills and sunsets behind Mission Valley Village MHP. Many homes have views of the golf course and the waterway. These homes have an afternoon breeze to clean the air and reduce the energy required for cooling. Building these apartments here will have a major impact on the value of all of the homes on this side of Grantville.

Compensation to the Residents

Archstone claims they are following City's guidelines (see attached PO300.401 the Housing Commission's Relocation Standards). Archstone states that they will be compensating the residents for the loss of their home.

If the home cannot be moved because of age or other reasons, Archstone has only offered to give the homeowner a rent subsidy equal to the difference in what the present rent at Mission Valley Village and what the rent would be in another part of the city. But this subsidy is ONLY for four years.

E-3 The project site is zoned RM-3-7. As stated in Section 2.6.5.1 of the EIR, in terms of use regulations, the RM-3-7 base zone permits multi-family residential use at a maximum density of one dwelling unit for each 1,000 square feet of lot area (Municipal Code, Section 131.0406). This would result in an allowed maximum of 445 dwelling units on the 10.22-acre project site. See also Responses to Comments E-2 above and E-4 below.

E-4 On February 28, 2006, the City Council adopted the Official Zoning Map (Ordinance No. R-301263) which renamed and updated the zoning of the site from its old code (San Diego Municipal Code prior to year 2000) zoning designation of R-1000 (also referred to as R-3) that allows for one dwelling unit per 1,000 square feet of lot area to the current Land Development Code (LDC) zone of RM-3-7 which also allows for one dwelling unit per 1,000 square feet of lot area. The City does not have a RM-3-1 zone as indicated in the letter.

E-5 As disclosed in the EIR, implementation of the proposed project would require deviations from the development regulations limiting building height and side yard setbacks, as well as approvals of a community plan amendment and rezone (to remove the MHPOZ - see Response to Comment E-2), a site development permit, and vesting tentative map. These requests for deviations and approvals do not constitute planning violations, as each applicable development regulation or planning document allows for flexibility in implementation by providing procedures for complying with alternative designs. The proposed project's compliance with these procedures is discussed at length in the EIR in Section 3.3 and elsewhere.

The environmental effects of the proposed deviations and approvals are the subject of the EIR. In keeping with CEQA and City guidelines, the analyses in the EIR were conducted objectively and without bias. See also Responses to Comments E-8 through E-19.

The Allied Gardens community plan shows this parcel as a mobile home park with medium density of 119 homes. This is the lower density and should prevail as stipulated in the Mobile Home Overlay ordinance.

The people who moved into Mission Valley Village did not do so imprudently. Before moving in four years ago, when I went to the recorders office to see the zoning map for this park. It was zoned RM3-1 medium. The clerk explained this meant residential-medium density or 12 to 15 homes per acre. The clerk also explained this park also had a Mobile Home Park Overlay (MHPOZ) ordinance to protect the use for a mobile home park.

Since being sold to Archstone, the zoning on this parcel has mysteriously been changed to RM3-7. All of my attempts to find out when and how the RM3-1 zone was changed to RM3-7 have failed. I have been told this change is either propriety information, or that it was unavailable.

Archstone's project at 6850 Mission Gorge Rd. presently known as Mission Valley Village violates several city building codes for which they are seeking waivers. This project makes changes to the current 100 year flood plan lines, building permits limits, zoning, set back ordinances, height restrictions, traffic flow allowances, water usage, the views of over a hundred of the neighboring homes. *This project disturbs the natural flow of air through the area and would dramatically increase the carbon monoxide generated in this location.* Finally this EIR is so full of deliberate misrepresentations and bias favoring the project as to make the entire document suspect as to its entire content and should be deemed unusable.

View and Air Flow

Archstone pictures that were professionally done and look real nice, are themselves deliberately misleading as to the height of the buildings making them to seem much lower than they really are. We have included some actual photos of the Archstone Apartments that are the same height and design as this project. Compare the two photos or better yet drive down to 1440 Hotel Circle North stand about 80 feet away. This is the view homes directly across Mission Gorge Road will be seeing.

E-6 Over 100 homes across Mission Gorge Road from this parcel presently have a view of the hills and sunsets behind Mission Valley Village MHP. Many homes have views of the golf course and the waterway. These homes have an afternoon breeze to clean the air and reduce the energy required for cooling. Building these apartments here will have a major impact on the value of all of the homes on this side of Grantville.

Compensation to the Residents

Archstone claims they are following City's guidelines (see attached PO300.401 the Housing Commission's Relocation Standards). Archstone states that they will be compensating the residents for the loss of their home.

E-7 If the home cannot be moved because of age or other reasons, Archstone has only offered to give the homeowner a rent subsidy equal to the difference in what the present rent at Mission Valley Village and what the rent would be in another part of the city. But this subsidy is ONLY for four years.

E-6 As stated in the EIR Section 4.10.3, site specific views from public roadways or to or from public resources were considered in the visual impact analysis. Views from private property are not considered by CEQA or regulated by the City of San Diego. The views depicted in the comment letter photographs 1 and 2 show the perspective of a pedestrian within 80 feet of a four-story apartment building with a design similar to the one being proposed. However, given the 120-foot width of Mission Gorge Road and parkway (adjacent sidewalk and landscaping), these photographs do not accurately reflect the view homes directly across Mission Gorge Road would be seeing.

Section 4.3 of the EIR analyzed air quality impacts through state-of-the-art pollutant dispersion modeling that accounts for local and regional wind patterns and concluded that effects on air quality associated with implementation of the proposed project would not be significant.

E-7 As stated in Section 3.4.3 of the EIR, the existing Mission Valley Village Mobile Home Park would be closed, with all qualifying tenants of the park provided compensation and relocation assistance as required per the project Relocation Impact Report (RIR) that was prepared in conformance with California Government Code (Section 65863.7 et seq.), California Mobile Home Residency Law (Civil Code Section 798 et seq.) the City's Mobilehome Park Discontinuance and Tenant Relocation Regulations (Municipal Code, Section 143.0610 et seq.), and the City's Housing Commission Relocation Standards and Procedures. The San Diego Housing Commission has reviewed the RIR and deemed it adequate. The project applicant would show evidence that all required relocation assistance has been paid to all eligible displaced tenants prior to filing a final map or the issuance of building permits, in accordance with City requirements.

The subsidy is not based on the size of your present home but what the government says the size of apartment for one; two or three people needs. A small rent subsidy for only four years and no compensation for the loss of your home.

The home that many of these people have invested their life's entire savings (\$50,000 to \$100,000) will be gone. If they accept the rental subsidy, what do you do after 4 years? Not only have these homeowners been thrown out of their own home with little compensation, after four years they can no longer afford their apartment in San Diego. Seniors who used to be homeowners are now homeless. In the meantime Archstone is taking over \$800,000 a month in rents out of the city.

Archstone has also stated that the residents will be offered the ability to live in one of the new Rental Condos when they are finished, two to three years down the road at some amount of rent yet to be determined. [Notice the new name Condos instead of apartments; this is being done so that in a few years when Archstone wants to sell these unit's, as condos Archstone will not have to apply for a Condo Conversion.]

To date Archstone has not made any such offer to any of the residents. Archstone has offered to buy the homes where residents have had to leave or sell their homes for any reason. When residents have been forced to sell their homes, Archstone offers the N.A.D.A value (like Blue Book), which is only about 1/4 of the value, less than the home's value had prior to Archstone announcing that they were closing the park.

Homes that were sold in the park prior to the Archstone purchase for \$86,000 suddenly are now only worth \$8,000. The NADA assumes that there is a sales lot containing many homes that you can go to and buy these homes and move them to anywhere you like, just like a used car lot.

There are a number of vacant lots, where Archstone has purchased these homes from the owners. What Archstone failed to mention is 9 of these homes were sold to them after the death of one or more of the parents. Some of the deaths were caused by the stress of the pending loss of their homes.

The children or grand children of the residents sold 5 homes because every time the kids visited, their parents were crying; distressed about where they would live when Archstone closed the park. The rest were just tired of the effort and stress of trying to save their home and decided to leave San Diego. Lets face it these people are seniors many in their late 70's and 80's and only have just so much fight left in them.

Archstone states that they want to help the city implement the City of Villages concept. What you may not realize is this park already is a village in every sense of the word. Full of residents who volunteer time to their community, look out for one another & help their neighbors not only in times of great need - but everyday.

Putting in gym and a pool in a group of apartments doesn't make a village. What Archstone is bringing here is high-rise buildings, an additional stoplight, 795 cars in their parking structure and another 125 cars to be parked in the surrounding neighborhoods and a lot more traffic on Mission Gorge Road.

APPENDIX E

PRESERVING FLOODPLAINS AS OPEN SPACE AMENITIES**By Leslie Redick *Federal Guidelines for Insurance Zoning***

The U.S. National Flood Insurance Program is based on the 100-year floodplain. The designated area is divided into the floodway, where most frequent flood flows occur, and the floodway fringe, an area, which would receive light flooding in a 100-year flood.

Buildings in the floodway are not eligible for insurance, but the fringe is allowable if the structures are flood-proofed. Yet, damage still occurs. The flood insurance program was designed as a way of curbing development in the flood plain, yet in a way it has opened the door for more by offering a false sense of security.

Another choice in preventing development would be to rezone land. Often times it is too late to have property owners relocate and so engineering changes seem to be the next choice. Unfortunately these methods are expensive; ecologically damaging, and can exacerbate the problem.

The floodplain in San Diego is well established and any alterations to this area would require a great deal of study by city and federal offices to determine what these changes would have on the areas both above and down stream of these areas as discussed in the San Diego River Park Foundation document located at:

<http://www.sandiegoriver.org/documents/AdditionalInformation.pdf>

E-8 The proposed retaining wall would act as a channel wall on this section of the river. It appears that the 12' planned retaining wall does raise the multi million dollar buildings out of the projected floodplain. But how this diversion will effect the flood plain has not been thoroughly evaluated.

E-8 Floodplain alteration is discussed in Section 4.9.4.1 in the EIR. There are existing structures located within the FEMA floodplain in the western portion of the project site. The proposed project would be elevated above the FEMA floodplain and processed through FEMA in accordance with National Flood Insurance Program guidelines.

Traffic study

This EIR claims the current mobile home park generates 595 ATD (see pages 4.2-15 par 4.2.3.1 -b). So we did a traffic study at our park and counted every car. We found out the following:

6 to 10AM	2 to 6PM	All day (total ATD)
114 trips	97 trips	280 trips

Adjusting for the 89 homes currently occupied instead of 119 units when fully occupied:

6 to 10AM	2 to 6PM	All day (total ATD)
152 trips	129 trips	374 trips

Even fully occupied the mobile home park does not generate 595 ATD figure used in this EIR. **The ATD figure used in this EIR for the current mobile home park is inflated by 60%.**

The EIR estimates for the 444-unit proposed project: page 4.2-15 b.

E-9	6 to 10AM	2 to 6PM	All day (total ATD)
	214 trips per hr X 3	267 trips per hr X 3	2670 trips
	642 Am trips	801Pm trips?	

These EIR estimates of only 214 don't make sense, less than half of the apartments would have only one person driving to work in the morning. The Am rush time in this area is three hours long when adjusted for three hours. This appeared high so-

We actually measured traffic at the La Mirage complex located about ½ mile from Mission Valley Village. This complex has units about the type of apartment as the proposed Archstone Project. We counted the following:

6 to 10AM	2 to 6PM
1425 trips	2016 trips

E-10 While doing the traffic study we noticed the cars parked on the street and investigated this. The Mirage also met the city's required minimum parking off street parking requirements which proved to be a few spaces short for a project of this type. We did the counting early Sunday morning, as this was earlier than most visitors who would be arriving for the day. And we counted 431 cars parked on the street; some of these could of up to one mile from the owner's apartment. We stopped and ask some of the resident how often this happened and found out because of number of residents that live there exceeds the number of bed rooms and available designated parking spaces that it was every day, and some times they had to have some one that lives in their apartment drive down to one of the shopping centers to pick them up and drop them off the next day. We then ask if not having a parking space was a big concern for them. They would explain that their biggest fear was that their car would be broken into or they would be personally assaulted going or coming from their car.

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E-9 Regarding comments related to traffic: In accordance with City traffic impact analysis guidelines, the trip generation rates utilized in the project traffic study are from the City of San Diego's Trip Generation Manual for both the proposed project and the existing mobile home park project. All calculations and conclusions are based on standard traffic impact assessment practice.

E-10 Parking is addressed in the EIR in Section 4.2.5. As identified in Section 4.2.5.1, the proposed project would provide the required number of parking spaces, as well as an additional 13 spaces. No parking shortfalls are anticipated for the proposed project. The project would comply with the City's Municipal code requirements for the number of parking spaces provided.

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<u>6 to 10AM</u>	<u>2 to 6PM</u>
449 trips	635 trips

The evening traffic is much worse, because there are more in coming cars at this time of day, you have the workers returning and residents that are in fact are returning from a shopping trip for dinner. The 250' left turn lane could hold 10 -12 cars at a time, the additional cars would be lined up in the through traffic lanes reducing traffic flow even more.

PR-19

Widening the street is not possible and the medium is not wide enough to allow a added turn lane this would further crimp the flow of traffic at this point. Narrowing the bike lanes and traffic lanes is dangerous and may cause auto bike accidents here.

Using standard light times for turn signals and because there is only a single lane on the street (two lanes out of the complex for the AM) only 10 to 15 cars would be able to make each light. It will require a minimum 36 light changes to move the 550 cars back in to the complex. $36 \times 3 =$ one hour and forty minuets of additional delays in the evening. Total Dailey traffic delays of 2 hours and 40 minuets.

I am not a traffic engineer but this seems fairly simple and to me a major problem for the people who commute. In the paragraph 4.2.3.2 the EIR does state that there is a significant impact of over one second at this point. One second! Are they kidding?

E-11 We called the local Police department found out from them; because these were luxury apartments and there was a high concentration of upper end autos and the distance from the owner's homes they are parked they were prime targets for both breaking into and theft. It was considered common for the high-end apartments to attract crime to the neighborhood. In the past 30 days there have been 5 cars reported stolen four break-ins and three assaults. So crime may be something else Archstone may be able to bring to the community. We then divided the number of units for Archstone's project by the number for the Mirage to find out the approximate number of cars that would looking for parking in the area near Greenbrier and Mission Gorge Rd. Times the number of cars parked on the street 531 to see how many cars to be looking for and how close they could find an available space.

$444/1410 = .314 \times 531 = 167$ cars almost every available parking space for $\frac{1}{4}$ of a mile in every direction.

Archstone reported to you in the EIR the current ATD for the park was 595 ATD with rush hours of about 150 cars. In this case the EIR has under reported or soft peddled Archstone's impact buy 30-50% and increased the present MHP's use and impact by over 100%. Viewing these gross errors or deliberate attempts to miss lead or miss represent the fact is cause to invalidate the entire traffic portion of this report.

The city also requires that a project of this size require that it be located no farther than 500' from Public Transportation (PT). This project is over 2500' from the nearest PT. Archstone has offered to provide a privet shuttle for a couple hours a day. But Archstone is not legally bound to continue this shuttle. They could discontinue the shuttle at anytime. So this offer is meaningless.

This property is at a choke point on Mission Gorge Rd and is the Narrowest point on the entire stretch of road from Santee to I- 8 & 15 and will add a total delay of over one hour to the early morning and 1hr& 40 minuets to the evening commute. I am sure that there are ways to figure out how many minuets this adds to each commute but it looks like it is at least 6 minutes during the morning and 12 to 18 minutes in the evening. And there are no plans to widen Mission Gorge Rd between Old Cliffs Rd and Zion. According the EIR and the city there are no

E-11 The public services Section 4.13 of the EIR addressed potential project affects on area crime and demand for police protection services. As part of this analysis, the City Police Department was sent a letter of service availability request that solicited response from the Office of the Chief of Police that identified existing and project-anticipated call types and response times. It was concluded in Section 4.13.3.1.b, that the proposed project would result in additional demand for police services and likely increase response times unless additional officers were added. Thus, while the proposed project would not result in a physical impact on the environment arising from the need for new or modified facilities, the applicant would compensate for the initial costs of providing additional officers to offset the effect on police response time.

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E-12 Alternative transportation is addressed in Section 4.2.7 of the EIR in accordance with City's CEQA Significance Determination Thresholds. It was concluded that the proposed project would not contain any features that would conflict with adopted policies or programs supporting alternative transportation locally or regionally. In addition, the proposed project includes several features that could support increased transit use of existing or planned transit facilities. A limiting factor for light rail (LRT) service is proximity to the LRT station. Shuttle service, as proposed, between residential hubs and LRT station could fill that need.

The owner/applicant would be legally bound to provide a private shuttle service to the trolley station and nearby retail services as required by the Site Development Permit condition and specific Mitigation, Monitoring, and Reporting Program (MMRP) measure as follows: "The Owner/Permittee shall provide and maintain a private shuttle connecting the project to the trolley station and nearby retail services. Consequently, the City and the project Owner/Permittee shall coordinate to provide this ridesharing service, which should be satisfactory to both parties. The ridesharing service will be limited to the peak hours from 6:00 AM through 10:00 AM in the morning and 3:00 PM through 7:00 PM in the evening." If the shuttle service is discontinued without an amendment to the permit, the applicant/owner would be in violation of said permit condition and the requirements under CEQA to implement appropriate measures that could mitigate potential impacts to a level below significance.

mitigating factors. Yes there is, do not allow a new development at this site and keep the park. It is the wrong place to add make any changes that would add greatly to the ATD here. The Allied Garden community does not want your cars in front of their homes nor the crime that you might bring.

California Clean air Act 4.3.1

E-13 Just the additional 3,242 ATD will increase the generation of a lot of CO₂. But there will be hundreds of hours in which hundreds cars will be idling at the stoplight and in the parking structure. The additional CO₂ emissions from this idling should be included in this report!

The design of the apartments is such that the only way to cycle the air in the units is by using the air conditioner. The Air conditioner draws the air in from outside and this is where all of the cars are pumping out more CO₂.

I did notice that Archstone did spend a lot of time with on CO₂ emissions, so they are aware of these facts but would like for you to swallow them anyway. At the end of this section they give their pat answer that "the impact would not be significant". Again they have grossly understated the conditions that will exist. By starting by underestimating the amount of CO₂ from the hundreds of cars idling as they wait to exit the parking structure, they set up the conclusion of insignificant. This section is therefore incomplete and needs to be redone. We urge the city to use actual data collected from a similar parking structure & idling times to determine the additional emissions this project will cause.

Utilities 4.4.1.1 water

The EIR 4.4.3.1 claims in this section the Mobile Home Park (MHP) homes are occupied by 3.2 people. They estimate each person is using 150 gallons per day (GPD) so project our present water usage to be 57,000 GPD. Why they did not use actual water usage – which they have access to, nor did they use the actual number of residents using their leases is beyond understanding. Unless this was deliberately done.

They also claim that their Condos will only have 2.6 persons living in them and Mobile Home Park has 3.2 residents in each home. But on page 4.11.3.1 they estimate the total park residents as 120 in 100 homes or 1.2 per household. How do they figure a senior mobile home park has 3.2 people but their apartments will have only 2.6 people per household? Do not the same national averages include them as well.

The EIR projects this Archstone Condo water usage would only be 172,000 GPD claiming this is only three times current uses. Archstone's proposed project would only add a water impact of an additional 115,000 GPD (over our current 57,000).

But wait this is all projected data. Our park IS NOT using 57,000 GPD. Nowhere near that amount! This actual water usage (averaged from the last 4 months using Archstone's parks utility billing) is a total of 9,400 GPD (please ask for copies of this data from Archstone. Once again Archstone has used misleading statistical data when it suits their purpose. The current park doesn't have 3.2 people per household and doesn't use 57,000 GPD in water. This EIR inflates the current park water usage by 6 times.

E-13 The potential for localized carbon monoxide concentrations to significantly affect sensitive receptors (residents, schools, hospitals, etc.) was addressed in Section 4.3.5.1 of the EIR. The analysis was conducted in accordance with accepted City and state techniques, including the State Department of Transportation's *Transportation Project-Level Carbon Monoxide Protocol* and CALINE computer model. Analysis of three key intersections and two roadways was conducted in coordination with the traffic study, due to anticipated poor traffic flow and idling at these locations. Concentrations were calculated for 20 receptors for each intersection and roadway segment. Projected CO outputs were assessed for impact significance in accordance with state CO thresholds and the City's CEQA Significance Determination Thresholds. Conclusions of not significant are sound and based on standard calculation procedures and adopted state and federal air quality standards.

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E-14 The unit densities for the mobile home park (3.2 persons/dwelling unit) and the Archstone residences (2.6 persons/dwelling unit) are as set forth by the City of San Diego Water Department. In addition, the water demand rate of 150 gallons/person per day is also established by the City Water Department. Municipal water departments set these values as a means to ensure that the overall system design of the water system has adequate capacity to meet the potential current and future demand. While the actual dwelling unit density and water usage demand rate may be less than these averages for both the existing and proposed situations, it is necessary for the municipal agency to be able to compare the proposed use of the land to the existing underlying use for which the current system was designed for.

The proposed project calls for two - 8" watermain connections to allow for a looped fire main as required by the Fire Department. The domestic water service will be provided via a single 6" watermain connection. Irrigation water would be provided per a separate watermain tap, most likely a 2" or smaller connection. The greatest level of water usage that could occur at this site would occur during a fire event. However, the water demand for such an event would be no different than for any of the other multi-family developments in the area.

So, if you use Archstone's claim for 2.6 people in their 444-unit project using 150 gal per person (2.6 X 444 X 150) the projected water usage of this project is 173,000 GPD. By this projection method, for this project will use eighteen times more water than the current park.

If you apply the same average occupancy Archstone did of 3.2 people per dwelling in a 444-unit project each using 150 GPD (3.2 X 444 X 150) the projected water usage would be 213,120 GPD. The difference in the actual current parks total Dailey use of 9,400 gallons and the projected use of 213,120 gallons per day is a 203,720 GPD increase, this is 21 times more than the current park's usage.

The water consumption could be nearly a 100% increase over the EIR's estimate and over 21 times the current parks use. This is a yearly increase of 74,357,800 gallons. Enough to fill a water tank the size of a football field 100 yards long and 50 yards wide and as tall as a 16 storied building 165' deep.

The EIR estimated water usage by the current park is over stated by some 6 times to obscure the projected increase in water consumption by the proposed Condos. The EIR's projected water consumption is just wrong, but even using the lowest figure the water usage is 8 times higher than the current park. The EIR's misuse of the actual available data invalidates this section of the EIR

It is also stated in paragraph (a) that Archstone would be drawing off the water required for this project by attaching two 6 - 8" pipes to the existing 12" water main. Two 6" pipes would at full usage be able to reduce the water flow and pressure in the main water pipe by 60% and two 8" pipes could reduce the water and pressure by 80% to the homes and projects down line from Archstone. Meaning that if any new projects on Mission Gorge Rd. were planned, a new water main would have to be installed from Lake Murray to Mission Gorge. This just might be a significant increase.

Is it coincidence the Archstone's projects are less than the newly assigned 500 unit level where there is now a requirement to provide a source for the new water needed to be used in new developments. If you look accumulative at all of Archstone's projects you may find that Archstone is one of the largest users of new water in the city with and has avoided any accountability or responsibility for finding or providing any new water to the drought land.

The facts about water usage have been so misrepresented in this report. The actual water usage of the current park has been neglected in favor of some projected use. The people per household numbers have clearly been miss applied with a bias in favor of the Archstone project. This EIR water report has no value and should be rejected, and only is to be considered after the real information is presented.

Sewage 4.4.4.1

E-15 The EIR miss represented the water that is being used and projected use greatly but lets use the correct levels to see if there is any difference here.

Lets see now the EIR reports that the park's present sewer usage is .094 mgd that equals 94,000 GPD. Lets us analyze this a little, how is it this park with 120 seniors who are using 9,400 gallons of water is generating 10 times that much in sewage each day!

E-15 The unit densities, as well as the sewage generation rate for the mobilehome park and the Archstone residences, are as set forth by the Metropolitan Wastewater Department at the City of San Diego. It should be noted that the calculated flow rate for the existing mobile home park of 0.094 mgd is a "peak" flow rate based upon peaking factors established by the Wastewater Department. Similarly, the calculated flow rate for the proposed Archstone residences of 0.270 mgd is also a "peak" flow rate.

In the prepared sewer study by Rick Engineering Company for the project, it was determined that the depth of flow at the most critical junction within the Grantville Trunk Sewer, as identified by the Wastewater Department, would be 52% or just over one-half full. As such, the wastewater carrying capacity of the Grantville Trunk sewer would not be significantly affected by the proposed project. The sewer study as prepared by Rick Engineering Company has been reviewed and accepted by the Wastewater Department.

The proposed project does call for the installation of an on-site and private sewer pump lift station. This lift station would be operated and maintained at the sole expense of Archstone.

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I do not believe that it's possible. What I do believe is that who ever made this EIR knew the correct water usage for the park and deliberately altered it in both the water and sewage sections to show false and misleading data.

The EIR states that the new project would generate .270mgd (270,000 GPD) per day that's very close to being the correct quantity of sewage for 213,000 gallons of water (our projected usage for Archstone's project) but a long way from the EIR's projected water use in the last section. So lets take a real look at sewage.

Projected 270,000-9,400 GPD = a 260,600 gallon per day increase. That is 27 times the current generation. How does this affect the sewage carrying capability of the 15-sewage main?

When combined with the two projects all ready on the board with an additional 4200 units. Using the same figures this would add another 2 million gallons a day. Would not adding this one to them require that a new sewage main be installed?

Please bear with me, again it truly appears that whoever made this report deliberately altered the data so grossly that this section is useless for any use except for the title of this section.

Last but not least I think that it is wonderful how Archstone has convinced sewage to run uphill. If You look at and study the lay out of the project you will notice that the last section of units that is next to the golf course is 18' below the road level and the next section up is 9' below the street level and this would require a on site sewage lift station to Mission Gorge Rd.

Hazardous Waste 4.4.5.1

E-16 The EIR states that approval of this project would require the demolition of many of the homes that now belong to the residents of Mission Valley Village. If we are treating these manufactured homes the same as traditional homes, then we could be setting a president for doing the same with your home for a wealthy developer. The EIR also claims that only letting Archstone destroy these home would the hazardous waste be properly disposed of.

This is also a attempt to scare the Council or Housing Commission into approving this and be able get rid of all of this lethal stuff, where in fact only if you are destroying the home that any of these things (asbestos installation, lead paint) might be released into the air. More false or misleading data. Keeping the homes in the park would pose no environmental Damage nor to the residents or anyone or anything.

Energy 4.4.6.1

The EIR states that according to the U.S. Department of Energy every dwelling in the state of California uses 500 kwh of electricity but it has no time period but it looks to be monthly. Nor does this identify the size of the home or the number of residents. I have to give Archstone's designers and architects it would appear that they have been able to design a three bedroom condo that six students can live there with 24-7 air conditioning and lights is only going to use the same amount of electric power as a 80 year old person with no air conditioner and no computer. Archstone could average the Energy usage in a number of like unites from some of the 84,000 unites they already own around the US and offer some really accurate projected

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E-16 Section 4.4.5.1 of the EIR addresses the issue of solid waste and project effects on the public service of solid waste disposal (landfills). Section 14.4 addresses the issue of hazardous waste and potential effects on public health and safety. The EIR presents an objective assessment of solid and hazardous waste impacts associated with the proposed project, through calculations of projected waste volumes and identification of anticipated waste types and disposal. The EIR does not claim that by only allowing demolition of the mobile homes would hazardous waste be properly disposed of. The analysis factually states that due to the age of the existing buildings, there is a potential for the presence of asbestos and/or lead-based paint on-site. Local, state and federal regulations mandate the abatement of hazardous materials under certain circumstances such as demolition or disturbance that would potentially release hazardous substances into the environment (soil, air or water).

LETTER

RESPONSE

I do not believe that it's possible. What I do believe is that who ever made this EIR knew the correct water usage for the park and deliberately altered it in both the water and sewage sections to show false and misleading data.

The EIR states that the new project would generate .270mgd (270,000 GPD) per day that's very close to being the correct quantity of sewage for 213,000 gallons of water (our projected usage for Archstone's project) but a long way from the EIR's projected water use in the last section. So lets take a real look at sewage.

Projected 270,000-9,400 GPD = a 260,600 gallon per day increase. That is 27 times the current generation. How does this affect the sewage carrying capability of the 15-sewage main?

When combined with the two projects all ready on the board with an additional 4200 units. Using the same figures this would add another 2 million gallons a day. Would not adding this one to them require that a new sewage main be installed?

Please bear with me, again it truly appears that whoever made this report deliberately altered the data so grossly that this section is useless for any use except for the title of this section.

Last but not least I think that it is wonderful how Archstone has convinced sewage to run uphill. If You look at and study the lay out of the project you will notice that the last section of units that is next to the golf course is 18' below the road level and the next section up is 9' below the street level and this would require a on site sewage lift station to Mission Gorge Rd.

Hazardous Waste 4.4.5.1

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E-17 The 500 kWh electricity consumption rate identified in Section 4.4.6.1 of the EIR is a monthly rate. To maintain consistency with the estimates of electricity consumption contained in Section 7.15.5 (Global Warming) and the annual natural gas usage projections, the first paragraph of Section 4.4.6.1 was revised as follows:

According to the U.S. Department of Energy (DOE) national average electricity consumption rates, ~~on average~~, each residential dwelling unit in the state of California consumes approximately 500-7,080 kWh (kilowatt hours) per year (DOE 2006). Since the Archstone - Mission Gorge project proposes to develop 444 dwelling units, the total approximate electricity consumption for residential uses based on this consumption factor is estimated to be approximately 222,0003,143,520 kWh per year. In terms of natural gas, based on the average use of 26 therms per year, it is estimated that approximately 11,544 therms per year would be used. SDG&E would provide gas and electricity to the project.

Contrary to what is suggested in the comment, not all of proposed the 444 residential units would be three-bedroom units. The majority of the total units would be one- (45.7 percent) and two-bedroom (47.5 percent) units; 6.8 percent of the total units would be three-bedroom units. National electricity consumption averages account for variability in individual dwelling size and use patterns (such as the use of air conditioning). The issue determining significance (as stated in the Significance Determination Thresholds, Section 4.4.2) is whether or not project implementation would result in the need for construction of new or expanded public facilities in order to provide energy to the project that would result in physical impacts to the environment. While the proposed project would increase demand for energy compared to existing uses, SDG&E has indicated it has adequate facilities to serve the project and no new facilities would need to be constructed. Therefore, energy impacts were concluded to be not significant.

data. Do you really think they do not already have that information and are using it to plan the construction for this project around that data?

A 444-unit Condo X 500 X 12 = 2,664,000 kwh annually
A 200-unit Condo X 500 X 12 = 1,200,000 kwh annually

We gather the actual electricity data from the current mobile home park for the last 4 months (April through July).

The actual park usage was 8.2 Kwh per day per household: a average of 246 kwh per month per household X 119 = 29,286 kwh per month for a fully occupied park

The resident of this mobile home park use less than half of the USDE estimated usage. Most do not have or use Air conditioning because it is not needed or too expensive to operate. Many go to bed at sunset and only a few have computers. By OVER estimating what the current park uses, and grossly under estimating what their condos will use this EIR distorts the energy consumption of this proposed project. The EIR conclusion is that energy required for this project is available from somewhere.

Archstone can promise all the solar-powered, energy efficient gadgets they want (discussed in section 4.4.6.1 para. 2). The current homes in this park use 49% of the USDE average. As new modular homes are brought into the park, they will include even more energy efficient technology that Archstone is offering.

The same problem measuring electricity usage applies to natural gas usage. Statistics are being used when the actual data is available to both the city and to Archstone. The estimate of 26 terms (thermal units) per year per household IS NOT what is actually consumed by the current park.

The actual average gas usage for 4 months of data was 51cu ft per day per household in a month. 51cu ft X 119 units = 6,069 cu ft for a fully occupied park.
6,069 cu ft X 12 = 18,306 cu ft per year for the entire (fully occupied) park.
18,306 cu ft / 100 = 183 terms year (for a fully occupied park).

Archstone's propensity for underestimating or hiding project usage of everything else would indicate that the same was done here. However the 11,544 terms is still 63 times MORE than the parks present use.

The EIR's energy section uses statistical data, which DOES NOT represent the current park usage of energy. We cannot verify the claimed availability of 2,359 MW's of electricity and gas. But this electrical and gas availability should be verified in light of the "loose" use of statistics in this EIR. Please bear with me Again because of these gross errors in this Section it should be sent back until more accurate data can be located in order to allow the Housing commission and the City Council to make a good and correct decision and not have to guess on and hope it will all work out.

Prehistoric/Historic Resources 4.5.1.1

E-18 Archstone claims that the only way to save the prehistoric & historic resources is for them to dig them up now. No, if they have been in the ground this long another 50 to 100 years shouldn't hurt a bit. No matter how careful a plan is made a big bulldozer can destroy artifacts

E-18 The EIR does not state nor infer that the only way to preserve prehistoric and historic resources is to excavate. The cultural resources analysis in Section 4.5 of the EIR objectively acknowledges the potential for the presence of as yet unknown subsurface resources, and provides mitigation for the proposed project in the form of construction monitoring in the event on-site soils in the western portion of the project site are graded. This is standard practice for any proposed development project in the City of San Diego. The San Diego County Archaeological Society has reviewed and agreed with the EIR impact analysis and mitigation measures (refer to Comment letter C).

before they are even recognized. This EIR argument to approve this plan based on preserving historic artifacts is not valid and should be disallowed.

Existing Ambient Noise 4.6.1.2

Archstone measured the noise level for a whole 15 minutes on a single day and deducted all the data for protecting future residents based on this single reading. During that 15-minute test the sound level reached 76db, which exceeds the maximum allowed (65db) for residential uses (4.6.1.1.b).

The decibel scale is NOT linear. Each 3 db of sound is actually double the volume. So a sound 11 decibels higher is 3.6 times louder than the threshold acceptable by the city.

When calculating the interior and exterior noise levels, instead of using their own measurements of 76db, the EIR uses projected future traffic noise levels and estimates 65 CNEL as the exterior noise. This is another example of using projected data when it is favorable to the acceptance of this project, where actual data exists.

E-19 The projected Traffic Impact Analysis for the year 2030 is placed into a FHWA Traffic Noise model to extract future noise projections. The future noise projections shown on Table 4.6-4 (at location 2, 6, 7, 8 & 9) are not much more than what is being measure today – although the traffic is level is projected to increase 2 and ½ times present levels.

The Mitigation planned (4.6.5.2) for the effected units in the eastern part of the project is to build in an air-conditioning system and "extra" insulation on windows and doors. The residents of these units will pay for the electricity used to operate the air conditioning system – not the builder. The additional electricity to operate this air conditioning system was NOT included in the discussion about electricity consumption. No evidence is presented to support the theory the closed windows and "extra" insulation will lower the interior noise 25 to 34 db. Required to meet the city's threshold. By the way, a 30 db change is 1,000 times up or down the reference or starting number.

If for no other reason the proposed project should be rejected as being incompatible to this site for safety reasons. You can see by the **Table 4.6-4 and figure 4.6-3** any units on the front half of this property would not allow anyone to go outside, open a window or open a door on a patio without being exposed to unacceptable risk of hearing loss.

Any residents living anywhere in a complex at this location that might have a hearing loss and would be able to sue Archstone and the city because the danger was known before starting to build here and then allowed to continue. To allow this project to continue will be opening the city for many law suites by the further residents of this proposed project.

Current residents are very much aware of the noise levels from the street. They have long been asking for and have been promised for years an aesthetic plant able sound wall, with an orderly appearance that would be pleasing to pedestrians and motorist traversing the area, and one that would be enjoyed by all. Yet it would be high enough to deflect sound away from current homes. Such a sound wall could be build quickly and without moving a single current home. Nor would the noise of this construction reach a level that to disturb the neighbors and the environment.

E-19 As discussed in Section 4.2 of the EIR, the proposed project would create an additional 2,075 ADT compared to existing conditions, which would incrementally increase traffic noise within the project vicinity. The noise analysis in Section 4.6 assesses future projected noise impacts based on an exterior noise standard (not projection) of 65 decibels. This is the maximum noise level considered compatible with residential land uses. Cumulative increases in future noise levels as shown in Table I-4 above (see Response to Comment I-4) would not be significant. It is commonly accepted that a noise increase perceptible to human hearing is approximately 3 dB (A). As shown in the Table I-4, the projected increase in ambient noise levels within the project vicinity resulting from the project's contribution to cumulative traffic noise would be well below 3 dB (A). (See also Response to Comment E-17 above).

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9.2.8.1 Archstone and the EIR has implied that having the mobile home park here is the source of most of the damage and pollutants that is being dumped into the San Diego River, and all of that will change only if Archstone is allowed to build this *wonderful money sucking oops sorry*, 440 unit nice expensive Luxury condo complex.

The EIR states and talks about its and Archstone's concern for the San Diego River. The San Diego River has almost 400 square miles of the local cities drains into San Diego River when it rains. Our park has three patches of grass that in total is smaller than a tennis court and is watered sparingly. Nearly every plant except for our trees is potted. All of the pets are house pets and when one of our small dogs is walked out side of its home, the owner has the leash in his hand and a baggie in their pocket.

All of the rain water that might flow across our 10.2 acre Mobile Home park's streets, onto the golf course and into the San Diego River is with the knowledge and in control of Archstone Smith. In fact every thing Archstone and the EIR complains about, the condition and up keep of all of parks utilities, the run off and any electrical or sewage issue discussed in the EIR, is in that state because the previous owners and Archstone allows them to be that way, not the homeowners. The homeowners even had to attempt and sue to have them properly maintained. When Archstone bought the park Archstone allowed the previous owners to keep all of the money the previous owners had received from the various utility companies to maintain and update those same utility systems and had not.

Archstone proudly talks about how they are going to offer 20% of these new units as affordable or I should say, Simi affordable or maybe I should say at a price to be determined at some further date. And there will have 88 of them then, for a short while anyway. Lets look a little closer at this offer. 1. There is presently only a few truly affordable homes for seniors in all of Allied Gardens, Grantville, Mission Valley, North Park, Fashion Valley, Terra Santa Linda Vista Kearney Mesa Point Loma and Archstone is holding 1/4 of them and all of the most affordable spots as hostages. That's is the 119 homes of the Residents Of mission Valley Village, the EIR and Archstone talks freely about being able to destroy all of them.

The city has mandate because of the extreme shortage of affordable homes in San Diego, that any and new development in San Diego must include at least 10% for low and medium income families. It was intended to increase the number of affordable homes available not reduce them. Example - 119 available now for seniors+ 88 projected is short 31 homes. To actually meet this mandate Archstone would have to replace the 119 homes and add 10% of the new homes $444 - 119 + 32.5 = 152$ of the new units would be required to only be rented to very low, low and medium income persons (forget the retired seniors), if they can qualify. But on the next page paragraph 9.2.11.2 The EIR talks about how Archstone would also be able pay a one time In-Lieu-Of-Fee or get around this by putting the people up some were else, but not here. It also does not necessary apply to the residents that live in those homes now in Mission Valley Village, the actual people that will be losing their home.

Summary

E-20 This EIR is INCOMPLETE in that when it considers the No Project Alternative, it assumes the property owner will not be forced to correct deficiencies in the sewer, electrical, water run-off or noise abatement for the property that they own and rent to the public. So far, the city Housing Department has not forced corporate owners (past or present) to comply with city ordinances.

However if this parcel were to become a Resident Owned Park (ROP) these deficiencies would be corrected, not by any threat from the Housing Department but by the demand of the residents themselves. The EIR has not considered the alternative of retaining this property as a

E-20 The EIR did not identify deficiencies of the existing mobile home park relative to noise or electricity. The EIR did identify improvements to runoff water quality given the proposed project's mandatory compliance with current runoff water quality regulations compared to runoff water quality under current conditions. The existing mobile home park operates under building permits issued many years ago and is not subject to the current water quality standards that projects submitting requests for building permits from the City are subject to today. See also Response to Comment B-4.

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mobile home park — under resident ownership. Nor did the EIR consider keeping it as a rental Mobile Home Park with these deficiencies corrected and therefore is INCOMPLETE.

This Environmental Report is full of distortions and written with a bias to approving this Archstone project. When it suits the purpose of approving the project, statistical, demographic, or projected data is used where actual data exists and was easy to find.

E-21 The residents collected data (on traffic, electricity and gas) to show the assumptions made in this report are fictitious and biased toward approval of this project. "On some topics data was not readily available to the residents. All of the data and assumptions used in this report are suspect and should be given a thorough review and corrected before accepting this EIR.

The finished EIR should Report that this project is at the wrong place, this project or any new residential project. It would severely impact the traffic flow on Mission Gorge Rd. add a large amount of CO 2 and pollutants at this location. It would consume far too much energy; water and could place more compatible projects at risk would not provide adequate parking for it residents and would attract an unsavory opportunity for crime in the community. It does not meet the ambient noise standards for a new development for housing. Even work locations with this much noise require the warring hearing protection at all times. The noise at this location is over 1,000 times allowed for new residential developments and opens the city up for many personal injury suites for a hearing loss that may affect any resident at any time the hearing loss occurs to any one that ever lives here.

This 73-foot high structure is not in compliance with any of the building codes, height, set backs and would not be in keeping with the surrounding building in a residential neighborhood and location to public transportation. The height would dramatically alter the appearance of the community, over 100 home's views and air quality, afternoon breezes, natural cooling and energy use. Like the Archstone apartments on Hotel Circle North, the bulk and size of this project do not add to the open and friendly feeling of Allied Gardens it is well overwhelming to every other residences at this location.

It will adversely affect the natural environment and the wild life of the river by adding over a thousand people to a location that is home of many different species of birds and animals that would nest roost and live next to such a large concentration of people their noise, light, smell and presence will adversely effect this natural area for ever.

The EIR should address the impact that the discontinuance of the park has on the residences of the loss of their homes, their lives savings, their neighbors, their sense of family, their support, their Doctors and hospitals and their community and in some cases their lives.

San Diego Housing Commission

POLICY

Subject: MOBILE HOME PARK DEVELOPMENT

Number: PO300.401 Effective Date: 10/3/95 Page 1 of 2

1. PURPOSE

1.1 To clarify the role of the Housing Commission with regard to mobile home parks and, in part, to implement Sec. 101.1001B of the Mobile Home Park Overlay Zone, Division 10 of the Zoning Code. It is the Commission's intent that the policy be applicable City-wide except that it will not apply to the De Anza Mobile Home Park. It is the intention of the City to deal with any discontinuance and relocation issues involved with De Anza Mobile Home Park by separate ordinance or resolution because of the unique conditions applicable to the De Anza Mobile Home Park.

2. BACKGROUND

2.1 Mobile homes have been a significant source of affordable housing to the elderly and other small, low

E-21 In accordance with CEQA Statute 21082.2, argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. The specific technical reports (traffic impact analysis, acoustical site assessment, preliminary hydrology study, etc.) prepared by professionals were reviewed by staff for each specific discipline based on local, state, and federal regulations and guidelines. The conclusions, as disclosed in the EIR, are based on the substantial evidence in light of the whole record. The analyses contained in the EIR are objective and rely on approved and standardized report methodology. A good faith effort was made to ensure that all data and assumptions used in the EIR are accurate and unbiased.

mobile home park – under resident ownership. Nor did the EIR consider keeping it as a rental Mobile Home Park with these deficiencies corrected and therefore is INCOMPLETE.

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The finished EIR should Report that this project is at the wrong place, this project or any new residential project. It would severally impact the traffic flow on Mission Gorge Rd. add a large amount of CO 2 and pollutants at this location. It would consume far too much energy; water and could place more compatible projects at risk would not provide adequate parking for it residents and would attract an unsavory opportunity for crime in the community. It does not meet the ambient noise standards for a new development for housing. Even work locations with this much noise require the warring hearing protection at all times The noise at this location is over 1,000 times allowed for new residential developments and opens the city up for many personal injury suites for a hearing loss that may affect any resident at any time the hearing loss occurs to any one that ever lives here.

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San Diego Housing Commission

POLICYn

Subject: **MOBILE HOME PARK DEVELOPMENT**

Number: **PO300.401** Effective Date: 10/3/95 Page 1 of 2

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2. BACKGROUND

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E-22 Proposed building heights and their aesthetic effects on neighboring uses are addressed in Section 4.10 of the EIR. The project proposes average heights of 55 feet from proposed grade for residential structures and 59 feet from proposed grade for the parking structure. The main body of the residential structures would not exceed 47 feet in height above proposed grade. Other residential structural features, such as elevator towers, stairwells, and architectural elements, may extend above the main structure roof height resulting in a maximum structure height of 55 to 59 feet from proposed grade. This would correspond with a maximum height above existing grade of 73 feet, as indicated in the comment. (In calculating building heights for the purposes of the Municipal Code, calculations must be based on the lower of the existing or proposed grade. Based on calculations to determine consistency with the Municipal Code height requirements, the project's main residential structure height would be at a maximum of 73 feet above existing grade.)

The EIR analysis concluded that the bulk and scale of the proposed structures would not adversely alter the appearance of the community given the presence of other existing 4-story structures (immediately to the south, and north along Mission Gorge Road), planned 4-story-plus structures to the north, and the proposed aesthetics of the project architectural and landscape design. The EIR analysis acknowledges that the proposed project would contrast with existing community character, especially with the low-density residential developments east across Mission Gorge Road; but concludes that the project design would not create a negative visual appearance as defined by the City's Significance Determination Thresholds.

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LETTER

RESPONSE

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POLICY

Subject: MOBILE HOME PARK DEVELOPMENT

Number: PO300.401 Effective Date: 10/3/95 Page 1 of 2

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2. BACKGROUND

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E-23 The Biological Resources Section 4.7 and Visual Effects Section 4.10 of the EIR address potential project impacts relative to the adjacent planned San Diego River Park and adopted MHPA associated with the San Diego River. Potential land use adjacency impacts to sensitive biological resources, including the least Bell's vireo and Cooper's Hawk, would be avoided through project adherence to the mitigation measures outlined in the EIR.

E-24 The RIR (see Response to Comment **E-7**) attached to the EIR as Appendix M and summarized in Sections 3.4.3 and 4.11, addressed all relevant issues applicable to discontinuation of the existing mobile home park as required by California Government Code (Section 65863.7 et seq.), California Mobile Home Residency Law (Civil Code Section 798 et seq.) the City's Mobilehome Park Discontinuance and Tenant Relocation Regulations (Municipal Code, Section 143.0610 et seq.), and the City's Housing Commission Relocation Standards and Procedures.

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income households. Mobile home parks are threatened with elimination because of high land values which cause park owners to consider other, more profitable uses. In recognition of these circumstances and in keeping with its commitment to expand and preserve low income housing opportunities, the Commission will provide limited support for new development of mobile home parks as appropriate, will assist resident or nonprofit initiatives for park preservation, and will oversee provision of relocation assistance. The provisions of this policy are in accordance with applicable City ordinances including Sec. 101.1002 Discontinuance of a Mobile Home Park and Sec. 101.1003 Sale of Mobile Home Parks.

3. NEW DEVELOPMENT

3.1 The Commission will aid developers of appropriately located proposed mobile home parks through provision of technical assistance.

3.2 Financial assistance may also be provided pursuant to the Commission's general guidelines for financial participation.

3.3 Parks to be assisted must be ownership or long term lease parks with residents controlling land through limited equity cooperative, nonprofit corporations or other partnership structures in order to maintain resident, nonprofit or public control and low income affordability.

3.4 Commission assistance in the development of new rental parks will be considered only under unusual circumstances or special opportunities such as housing for farmworkers.

4. PRESERVATION OF EXISTING MOBILE HOME PARKS

4.1 The primary vehicle for mobile home park preservation will be purchase of the park by the residents or a nonprofit corporation.

4.2 The Commission will provide technical assistance in assessing financial and managerial feasibility, accessing state and other programs which provide financing for resident acquisition, and by participating as co-applicant when required by the funding source.

[Supersedes Policy 300.401, Issued 4/11/80, Effective 10/3/95]

Authorized:

San Diego Housing Commission

POLICY

Subject: MOBILE HOME PARK DEVELOPMENT

Number: PO300.401 Effective Date: 10/3/95 Page 2 of 2

4.3 Financial assistance in the form of loans to park residents or nonprofit organizations to finance a portion of the acquisition cost may be available from the Commission within the Commission's financial participation guidelines.

4.4 The Commission may become financially involved in resident or nonprofit purchase of mobile home parks under the following circumstances, in rank order:

A. First priority - To preserve affordable housing for low income residents (parks at risk of discontinuance, with excessive rents or with substandard facilities), or

B. Second priority - To further homeownership (control of rents and management policies). In this instance, financial assistance will be limited to predevelopment funds unless it can be demonstrated that acquisition will involve a minimum amount of public investment and will result in greater affordability.

4.5 When Commission funds are invested, beyond predevelopment funds, resale controls will be considered, recognizing that homes have higher value when rents are restricted.

5. RELOCATION

5.1 Relocation plans required by the Mobile Home Park Overlay Zone will be reviewed by the Executive Director as to conformance with Commission standards.

5.2 Relocation will be treated as the responsibility of the private mobile home park owner, or the lessee in the case of a leasehold, and not a public responsibility. However, the Commission may assist the owner with relocation by:

A. Regularly reviewing the inventory of publicly owned land for possible use as a relocation park.

B. Assist by considering friendly condemnation which could have tax advantages for the owner, as suggested by the Mobile Home Community Issues Committee (MHCIC).

C. Providing financial assistance with resident park purchase when appropriate and as the budget permits.

D. Assisting in the development of an interim use mobile home relocation park when appropriate and as funds permit.

5.3 When public funds are used to assist in relocation, as in the development of an interim relocation park, priority will be given to those most at risk, i.e., very low income displacees.

5.4 This document is a policy and should not, therefore, be considered as creating any financial obligation on the part of the Housing Commission or the City to pay any costs with regard to relocation.

5.5 The MHCIC may review the Mobile Home Park Policy and administrative guidelines and, if it is deemed

necessary, recommend policy changes to the Housing Commission.

History

Adopted: 4/11/80

Revised: 3/15/93

Revised: 10/3/95

F:\POLICIES\PO300.401

Attachment 1

PO300.401, Effective 10/3/95

RELOCATION STANDARDS AND PROCEDURES

(To be an administrative guideline to implementing the relocation section of Policy 300.401, Revised 10/3/95)

1. To provide consistency in evaluating the adequacy of relocation plans, the fiscal standard against which relocation plans will be measured is:

a. In the case where it is feasible to relocate a mobile home, as determined by Housing Commission staff, the park owner shall reimburse the homeowner the actual cost within the following ranges:

Coach Size Relocation Amount

Minimum Maximum

8' AND 10' WIDE \$3,000 \$ 5,000

12' AND 14' WIDE \$5,000 \$ 7,000

DOUBLEWIDE \$7,500 \$15,000

In addition, any and all appurtenances would be valued and compensated up to \$1,000 total.

b. In cases where it is not feasible to relocate the mobile home, the park owner (or lessee in the case of a leasehold) shall provide the residence with reasonable relocation expenses as follows:

(1) The difference between current space rent and rent for a comparable apartment unit of a size appropriate to accommodate the displaced household and that meets HUD Housing Quality Standards with this amount provided for 48 months.

(2) Total actual cost of moving expenses for furniture and personal belongings not to exceed \$1,000.

(3) All proceeds from the sale of the mobile home.

2. During relocation the park owner (or lessee in the case of a leasehold) shall pay hotel or temporary lodging cost in

the amount of \$40 per night up to seven nights.

3. The Mobile Home Community Issues Committee (MHCIC), with the assistance of park owners and lessees and mobile home owners, will develop a list of available or vacant spaces to which their residents might move. This resource list would include lot sizes, existing rents and park policy regarding admission of older coaches.

4. All specific dollar amounts mentioned above will be adjusted in conformance with changes in the Consumer Price

Index, All Urban Consumers. San Diego Housing Commission

POLICY

Subject: MOBILE HOME PARK DEVELOPMENT

Number: PO300.401 Effective Date: 10/3/95 Page 1 of 2

1. PURPOSE

1.1 To clarify the role of the Housing Commission with regard to mobile home parks and, in part, to implement Sec. 101.1001B of the Mobile Home Park Overlay Zone, Division 10 of the Zoning Code. It is the Commission's intent that the policy be applicable City-wide except that it will not apply to the De Anza Mobile Home Park. It is the intention of the City to deal with any discontinuance and relocation issues involved with De Anza Mobile Home Park by separate ordinance or resolution because of the unique conditions applicable to the De Anza Mobile Home Park.

2. BACKGROUND

2.1 Mobile homes have been a significant source of affordable housing to the elderly and other small, low income households. Mobile home parks are threatened with elimination because of high land values which cause park owners to consider other, more profitable uses. In recognition of these circumstances and in keeping with its commitment to expand and preserve low income housing opportunities, the Commission will provide limited support for new development of mobile home parks as appropriate, will assist resident or nonprofit initiatives for park preservation, and will oversee provision of relocation assistance. The provisions of this policy are in accordance with applicable City ordinances including Sec. 101.1002 Discontinuance of a Mobile Home Park and Sec. 101.1003 Sale of Mobile Home Parks.

3. NEW DEVELOPMENT

3.1 The Commission will aid developers of appropriately located proposed mobile home parks through provision of technical assistance.

3.2 Financial assistance may also be provided pursuant to the Commission's general guidelines for financial participation.

3.3 Parks to be assisted must be ownership or long term lease parks with residents controlling land through limited equity cooperative, nonprofit corporations or other partnership structures in order to maintain resident, nonprofit or public control and low income affordability.

3.4 Commission assistance in the development of new rental parks will be considered only under unusual circumstances or special opportunities such as housing for farmworkers.

4. PRESERVATION OF EXISTING MOBILE HOME PARKS

4.1 The primary vehicle for mobile home park preservation will be purchase of the park by the residents or a nonprofit corporation.

4.2 The Commission will provide technical assistance in assessing financial and managerial feasibility, accessing state and other programs which provide financing for resident acquisition, and by participating as co-applicant when required by the funding source.

[Supersedes Policy 300.401, Issued 4/11/80, Effective 10/3/95]

Authorized:

San Diego Housing Commission

POLICY

Subject: **MOBILE HOME PARK DEVELOPMENT**

Number: **PO300.401** Effective Date: 10/3/95 Page 2 of 2

4.3 Financial assistance in the form of loans to park residents or nonprofit organizations to finance a portion of the acquisition cost may be available from the Commission within the Commission's financial participation guidelines.

4.4 The Commission may become financially involved in resident or nonprofit purchase of mobile home parks under the following circumstances, in rank order:

A. First priority - To preserve affordable housing for low income residents (parks at risk of discontinuance, with excessive rents or with substandard facilities), or

B. Second priority - To further homeownership (control of rents and management policies). In this instance, financial assistance will be limited to predevelopment funds unless it can be demonstrated that acquisition will involve a minimum amount of public investment and will result in greater affordability.

4.5 When Commission funds are invested, beyond predevelopment funds, resale controls will be considered, recognizing that homes have higher value when rents are restricted.

5. RELOCATION

5.1 Relocation plans required by the Mobile Home Park Overlay Zone will be reviewed by the Executive Director as to conformance with Commission standards.

5.2 Relocation will be treated as the responsibility of the private mobile home park owner, or the lessee in the case of a leasehold, and not a public responsibility. However, the Commission may assist the owner with relocation by:

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C. Providing financial assistance with resident park purchase when appropriate and as the budget permits.

D. Assisting in the development of an interim use mobile home relocation park when appropriate and as funds permit.

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5.5 The MHCIC may review the Mobile Home Park Policy and administrative guidelines and, if it is deemed necessary, recommend policy changes to the Housing Commission.

History

Adopted: 4/11/80

Revised: 3/15/93

Revised: 10/3/95

F:\C:\POLICIES\PO300.401

Attachment 1

PO300.401, Effective 10/3/95

RELOCATION STANDARDS AND PROCEDURES

(To be an administrative guideline to implementing the

LETTER

RESPONSE

relocation section of Policy 300.401, Revised 10/3/95)

1. To provide consistency in evaluating the adequacy of relocation plans, the fiscal standard against which relocation plans will be measured is:

a. In the case where it is feasible to relocate a mobile home, as determined by Housing Commission staff, the park owner shall reimburse the homeowner the actual cost within the following ranges:

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Minimum Maximum

8' AND 10' WIDE \$3,000 \$ 5,000

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DOUBLEWIDE \$7,500 \$15,000

In addition, any and all appurtenances would be valued and compensated up to \$1,000 total.

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(1) The difference between current space rent and rent for a comparable apartment unit of a size appropriate to accommodate the displaced household and that meets HUD Housing Quality Standards with this amount provided for 48 months.

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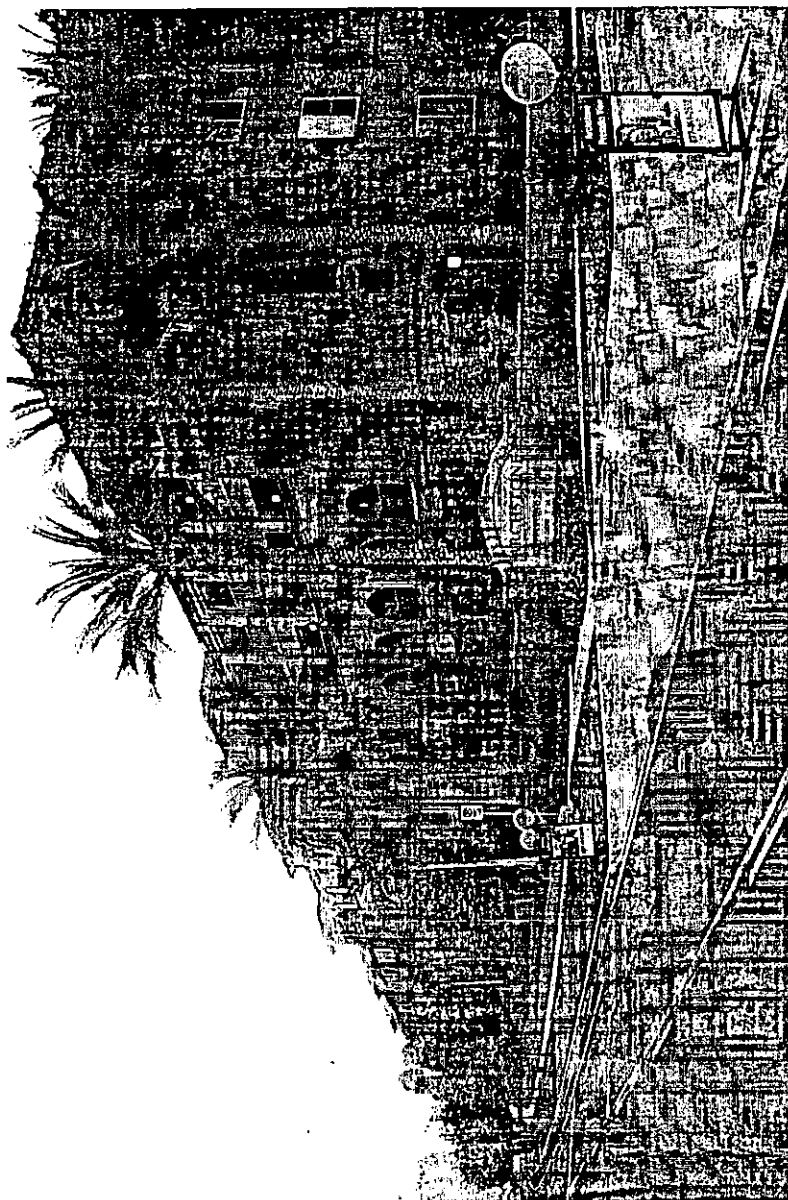
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4. All specific dollar amounts mentioned above will be adjusted in conformance with changes in the Consumer Price Index, All Urban Consumers.

LETTER

RESPONSE

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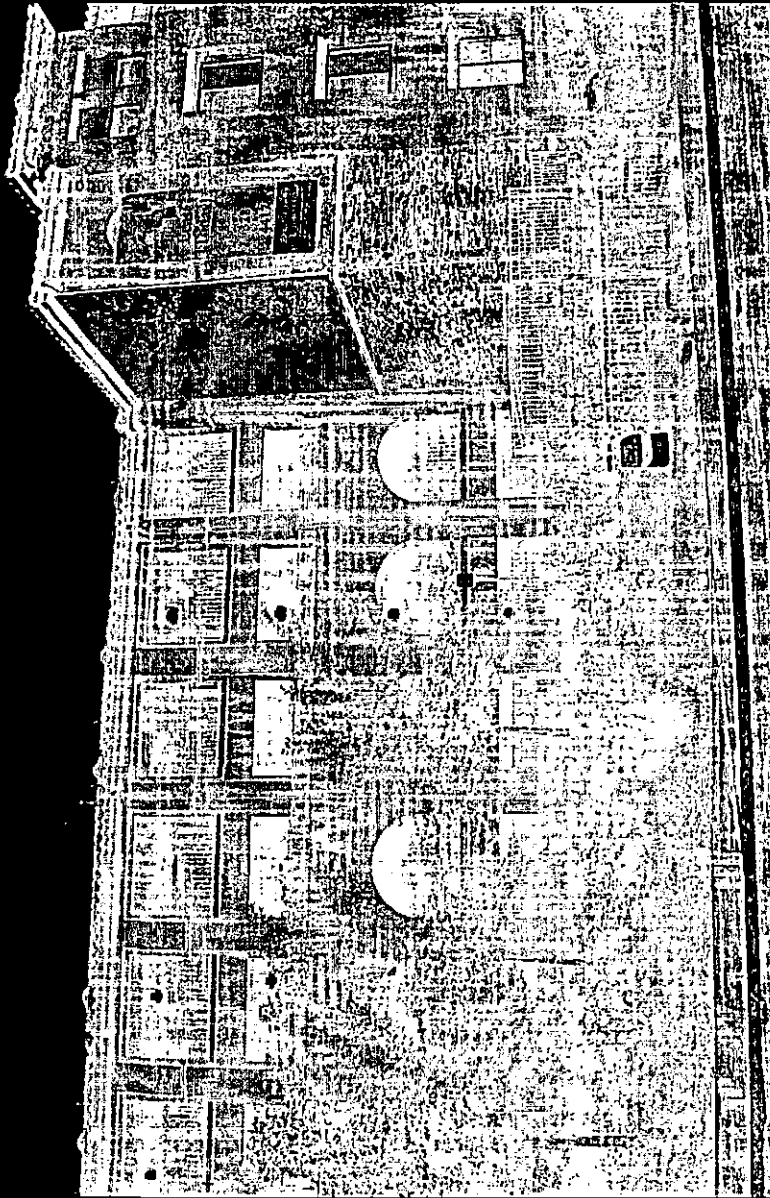


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LETTER

RESPONSE



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LETTER F

General Comments

- F-1 It is my opinion that this project is putting the 5 pounds of potatoes in a 2 pound bag. The development is asking for significant deviations to crowd in as many units as possible, impacting the river environment, historic and other elements. The project is ill conceived as it appears that the property acquisition was done without a concept for the reasonable potential of the property.
- F-2 The 'no dproject option' (inserted below) really pushes the envelope. There is nothing smart about the 'smart growth' argument. The DEIR states numerous places that traffic in 2030 will not be acceptable yet the developer insists that they should be allowed to contribute to the traffic impacts because it is insignificant compared to the overall future growth of traffic.

No Project/Retain Mobile Home Park

The No Project/Retain Mobile Home Park Alternative would be consistent with the Navajo Community Plan in that it would retain the Mobile Home Park Overlay and would eliminate the need for amending the Navajo Community Plan to remove the Mobile Home Park Overlay. This alternative would fall short of a number of the project's objectives. This includes the objective of providing affordable multi-family residential housing, the objective of addressing the City's shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley would not be met and the objective of applying smart growth principles through the provision of high-density residential units in an urbanized location adjacent to public transportation, employment, and other public infrastructure and services. Furthermore, due to the fact that the site was developed for mobile home park use prior to many recent/current land use development requirements, existing daily operation of the mobile home park results in potential impacts to biological resources, geology/soils, hydrology/water quality, and solid waste disposal that would be avoided through design or mitigation measures incorporated into the proposed project. For these reasons, the No Project/Retain Mobile Home Park Alternative would not be considered the Environmentally Superior Alternative.

There are places where high density will fit and this is not one of them - consider the 'city of villages' concept of the general plan and 'walkable' communities; this project will not be either. Residents will use their automobiles because 'adjacency to public transportation, employment and other public infrastructure and services' is a myth. The units most likely will be leased to SDSU students who will find it easier to drive the Greenbrier or Princess View routes to get to school and later drive off to their restaurant jobs in Mission Beach.

- The objective of multifamily housing is another push; the mobile home park already provides a multi-family community. The DEIR argument avoids the low cost element that is pushed in other paragraphs. The fact is that the mobile home park already provides affordable housing and the affordable housing that the developer is selling cannot be truly affordable for most of the mobile home park residents who are offered the right-of-first refusal to the projects affordable units. The rent for a mobile home and space will be at least twice as 'affordable' than for a project unit.
- F-3
- F-4 The existing environmental impacts of the mobile home park are actually better than the project would be. The mobile home park is not an imposing structure on the environment where the project with its 12 ft wall 20 feet from a MSCP pond part of the San Diego River. The noise of the residents echoing as noise does now as far away as Tierrasanta only worse because of the tiered design will drive away forever the mentioned least Bell vireo, Copper's Hawk and other animals. The development really ignores the goals of the San Diego River Park.
- I recommend that the project be rejected and the no project option be left in place for the benefit of Grantville and the surrounding human and animal communities and for the San Diego River Park.

- F-1 As disclosed in the EIR, implementation of the proposed project would require deviations from the development regulations limiting building height and side yard setbacks, as well as approvals of a community plan amendment and rezone (to remove the MHPOZ - see Response to Comment E-2), a site development permit, and vesting tentative map. These requests for deviations and approvals are accommodated in each applicable development regulation or planning document to allow for flexibility in implementation, through procedures outlining acceptability of alternative designs. The environmental effects of the proposed deviations and approvals are the subject of the EIR. In keeping with CEQA and City guidelines, the analyses in the EIR were conducted objectively and without bias. (See also Response to Comment E-5).
- F-2 As described in the EIR (Environmental Setting and Land Use) the City's General Plan builds on the City of Villages strategy, which aims to preserve remaining open space and natural habitat and focus development within areas with available public infrastructure, rather than outlying areas. The proposed project would be consistent with this strategy as demonstrated by being shown as having a moderate propensity for village development. As described, there is already existing water and sewer service at the site. Furthermore, the site does not contain any open space or natural habitat that would be removed for project development. The type of individuals that may reside in the proposed project is speculative and it would not be appropriate for the EIR to make assumptions in that regard.
- F-3 Comment noted. The comment address housing affordability which is a socioeconomic issue that is not the subject of CEQA and thus does not relate to the adequacy of the EIR.
- F-4 See Responses to Comments B-4 and E-20.

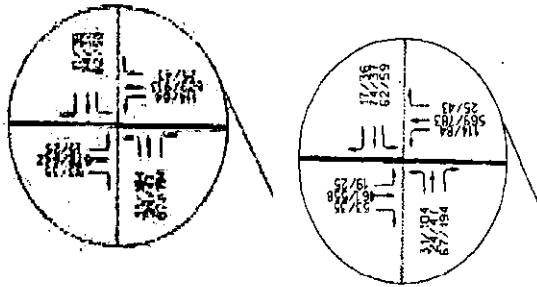
LETTER

RESPONSE

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F-5 1. THE DIER IS NOT REVIEWER FRIENDLY. THIS REALLY SUCKS !!! AND IS A NEW LOW FOR THE CITY OF SAN DIEGO.

- a. THE TEXT IS IN GRAPHICS FORMAT - WHY WAS THIS DONE?
- b. IT CAN NOT BE SEARCHED FOR SPECIFIC WORDS - WHY WAS THIS DONE?
- c. SELECTED TEXT CAN NOT BE REMOVED TO BE PART OF REVIEWER RESPONSES UNLESS IT IS IN A GRAPHIC BLOCK
- d. IT IS A SINGLE LARGE 33 MB FILE THAT IS VERY CUMBERSOME TO HANDLE. THE SECTIONS SHOULD HAVE BEEN SEPARATE FILES
- e. TRAFFIC STUDY FIGURES ARE OF SUCH POOR QUALITY WITH SHADOWY WATERMARK LOOKING STUFF OR OUT OF FOCUS THAT THEY ARE UNREADABLE YET THE FIGURES IN THE APPENDIX [WHICH MOST REVIEWERS WILL NOT ASK FOR] ARE MUCH MORE CLEAR..(SEE INSERTED EXAMPLES)



- f. WHO IS THE PERSON RESPONSIBLE FOR THIS?
- g. I UNDERSTAND THAT THE CONSULTANT 'RECON' WAS ASKED TO PROVIDE THE PDF AND HARDCOPIES BUT MAY HAVE NOT HAVE BEEN GIVEN SPECIFIC INSTRUCTIONS FOR THE INCLUSION OF REVIEWER FRIENDLY (PUBLIC FRIENDLY) PDF FEATURES. WILL A STANDARD PRACTICE BE GENERATED IN THE FUTURE TO ENSURE THAT THIS PRACTICE DOES NOT HAPPEN AGAIN.
- h. ANNE JARQUE OF DEVELOPMENT SEARVICES STATED, ' THAT IT WAS NOT OUR INTENT TO MAKE THE DOCUMENT SEARCHABLE BUT IT WAS INTENDED TO BE 'READABLE' - 1500 PAGES !!!!!'

F-6 2. Why were Scoping Meeting comments buried in the appendix to the DEIR [WHICH MOST REVIEWERS WILL NOT ASK FOR]? They should be part of the DEIR main doc where reviewers can easily reference to help guide the focus of their reviews. Please make the responses to DEIR and the scoping comments available in the final EIR as separate searchable pdf files.

F-5

- a. To assist reviewers, the Draft EIR was made available in hard copy and on CD in PDF format. The intent was to make it available in a format that would be accessible to reviewers.
- b. Comment noted.
- c. Comment noted.
- e. Comment noted.
- f. No comment to provide a response.
- g. The City of San Diego Environmental Analysis Section (EAS) does not have an established or published guideline or standard to create documents on CDs. EAS will work with support and senior staff to develop a standard for documents that are distributed on CD for future EIRs. The requirements could be incorporated in the City of San Diego Environmental Impact Report Guidelines.
- h. In the future, EAS will attempt to provide a PDF document that is searchable.
- i. Comment noted. The DEIR was converted to a PDF (portable document format) to provide the public an accessible and printable electronic document that can be viewed on any computer platform.

F-6

Copies of the comment letters that were received during the Notice of Preparation (NOP) and the Public Scoping Meeting were included as an Appendix A of the EIR. The City of San Diego Environmental Impact Report Guidelines, September 2002 (Updated December 2005) lists the NOP and comment letters to be included as part of the Appendices (under separate cover). These comment letters were provided as part of the administrative record and public process to get federal, state, and local responsible/trustee agencies as well as public entities, interested groups, and private citizens' input on the "scope" of the environmental issues to be discussed in the DEIR and is meant to supplement the information contained in the EIR.

Traffic Circulation section 4.2

- F-7 1. How accurate is the traffic circulation data in section 4.2 of the Archstone DEIR in percentage plus and minus.
When answering all the following questions regarding traffic numbers please identify the plus and minus accuracy in percentages.
- F-8 2. Table 4.2-6 below shows the list of cumulative projects used to estimate the traffic volumes generated by the cumulative projects. Except for the projects identified for the Grantville area specifically, 16) superior ready mix, 14) Centerpointe, 17) Grantville subdivisions, it cannot be determined what the specific impact of the other projects are to the Grantville/Navajo/Tierrasanta areas.
- Please provide the specific traffic volume impacts that will be generated affecting the Grantville/Navajo/Tierrasanta areas for each project that has been identified?
 - For each project please identify the mitigation for the traffic impact and/or the fair share compensation including the specific area of mitigation or fair share compensation?
 - Please add the military housing units scheduled for the 2011 time frame at santo rd north of highway 52 and factor traffic into the streets of Tierrasanta and mission gorge including santo rd at friars road.

**TABLE 4.2-6
LIST OF CUMULATIVE PROJECTS USED TO ESTIMATE
THE TRAFFIC VOLUMES GENERATED BY CUMULATIVE PROJECTS**

Project Name	Type	Traffic Volumes
1) Fashion Walk	Residential	970 ADT
2) Murray Canyon Apts.	Residential	1,698 ADT
3) River Walk	Health Club/Office/Restaurant	3,720 ADT
4) Levi Cushman	Mixed-Use	67,000 ADT
5) Mission Valley Heights	Residential	987 ADT
6) Rio Vista West	Residential	4,286 ADT
7) Presidio View	Mixed-Use	2,322 ADT
8) Fenton Residential	Residential	2,680 ADT
9) Morena Vista	Mixed-Use	1,586 ADT
10) Mission Valley YMCA	Commercial	917 ADT
11) Rio Vista East Lot 4	Residential	5,671 ADT
12) Cabrillo Military Housing	Residential	5,400 ADT
13) Mission Valley Fire Station	Civic	100 ADT
14) Centerpointe @ Grantville	Multi-Use	3,468 ADT
15) Quarry Falls (Phase I and II)	Mixed-Use	39,563 ADT
16) Superior Ready Mix	Mixed-Use	28,562 ADT
17) Grantville Subdivisions	Residential	6,903 ADT
18) Paseo	Mixed-Use	11,301 ADT
19) SDSU Master Plan	Education	10,901 ADT
TOTAL		197,995 ADT

- F-9 3. Consider the table 4.2- 6 above and refer to the figures below for the following discussion.
The figures show:
Old Cliffs to Greenbrier w/o T-Blvd and Santo shows: 61,440 ADT
Old Cliffs to Greenbrier with T-Blvd and Santo shows: 59,770 ADT
difference shows: -1,670 ADT

F-7 The data contained in the traffic study, the analysis of the data, and results; were collected and processed in a manner consistent with agency guidelines and industry standards. There is no published data in terms of "percentage plus or minus" that applies to the traffic circulation data as a whole.

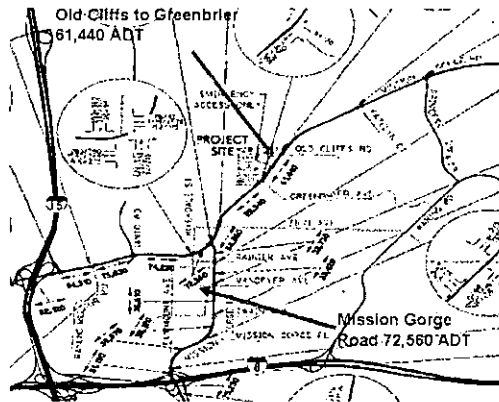
F-8 Cumulative projects are included in the traffic study based on the size of the project, the proximity the cumulative project to the study project and the propensity of the project trips to combine for a cumulative effect in the study area. The 19 projects included as cumulative projects for this study were included based on the judgment of the Project Engineer and City Traffic Engineering staff. Specific details for each cumulative project can be found in each cumulative project traffic study.

F-9 The traffic volumes contained in the long range analysis were obtained from the applicable SANDAG traffic models. The volume of traffic shown in the exhibits is consistent. The volumes shown on the "2030 w/o Tierrasanta and Santo Rd" only show traffic volumes in the vicinity of the project whereas the "2030 w/ Tierrasanta and Santo" show volumes all the way up to and including the Tierrasanta/Princess View intersection.

Estimating cut through traffic from the I-15 to the I-8 is not pertinent to the evaluation of this project and is beyond the approved scope of this study.

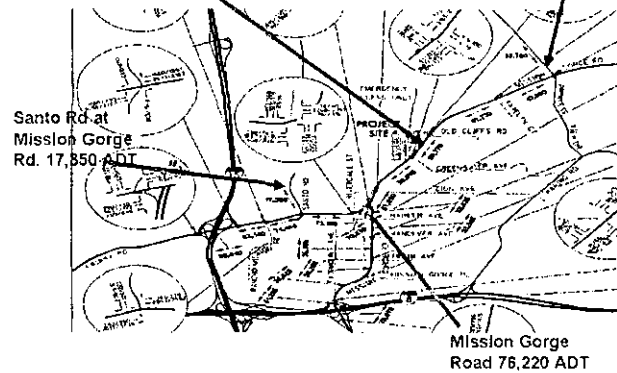
- a. If we have similar traffic [-1670 ADT] on Miss Gorge Road WITH T-Blvd and Santo into Mission Gorge then where does the 32,780 ADTs on Tierrasanta blvd come from and go to .
- b. How much traffic on Tierrasanta Blvd ,Princess View, College Ave., Mission Gorge and Jackson Drive can be attributed to through traffic to/from I-15 to and for streets that apply the through traffic from hwy 8 at college ave.?

Grantville Redevelopment Area Update
 Traffic impacts from Archstone PEIR- Year 2030 w/o Tierrasanta Blvd & Santo



Grantville Redevelopment Area Update

Traffic impacts from Archstone PEIR- Year 2030 with Tierrasanta Blvd & Santo
 Old Cliffs to Greenbrier 59,770 ADT
 Tierrasanta Blvd at Princess View 32,780 ADT



- F-10⁴. Using the table below from the Intracorp condo traffic study, March 17, 2005, prepared by Rick Engineering 14855 or j-143855, please provide in table format an update to the traffic volumes for the horizon year for the identified roadways based upon the analysis of the traffic impacts due to the 19 projects that are identified in Table 4.2-6 above projects plus the proposed military housing at santo north of rt 52. Consider Tierrasanta Blvd and Santo Rd as connected to Mission Gorge Rd. Sorry for the quality; this was best copy from the original document. This is appropriate since the 32,780 ADTs for Tierrasanta blvd with the blvd extended in 2050 must have been derived partially by considering traffic through Tierrasanta.

F-10 The data and study referred to in this comment is not related to this project.

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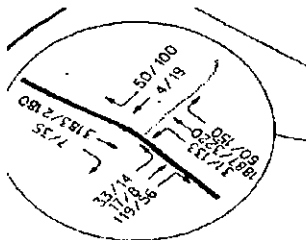
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- F-11** The scope of the traffic study was based on established City Guidelines for determining what intersections and segments are required for inclusion.
- F-12** The scope of the traffic study was based on established City Guidelines for determining what intersections and segments are required for inclusion.

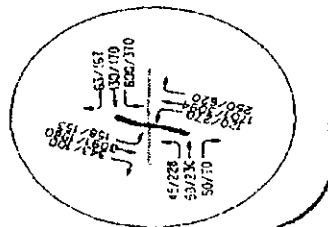
housing at santo north of rt 52. Consider Tierrasanta Blvd and Santo Rd as connected to Mission Gorge Rd.

- a. Greenbrier Ave
- b. B. Allied Rd
- c. Jackson Dr.
- d. Fontaine Street
- e. Waring Rd east of Princess View
- f. Waring Rd east of Green Brier
- g. Zion Ave
- h. Waring Rd east of Zion Ave
- i. Vandever east of Mission Gorge road
- j. Delbarton St. south of Zion Ave
- k. Twain Ave east of Mission Gorge rd
- l. College Ave south of Navajo Rd.
- m. Navajo Rd north of the Waring Rd / College Ave Junction

- F-13 7. Please provide the LOS for the Roadways identified in Traffic Circulation Item 6 above 5 above.
- F-14 8. How will the addition of a traffic light proposed for Greenbrier at Mission Gorge Rd cause traffic impact on Allied Rd. please provide ADT traffic volumes for Allied Rd. since Allied rd. will be used as a shortcut and a bypass for the traffic light. Turn analysis at the allied rd. intersection was ignored in the deir.
- F-15 9. Below are the traffic bubbles for greenbrier at mission gorge rd and zion at mission gorge rd..
- a. why is there no left turn from greenbrier to mission gorge south and mission gorge south to greenbrier. With this plan traffic from waring rd wishing to get to/from mission gorge rd will go to zion ave.
 - b. it appears that zion in 2030 will have gone from 8k adt currently to 17 k adt in 2030. What is the LOS for zion currently and for the 2030 horizon year.
 - c. If greenbrier had the left turns in 9. a. installed how would both roads be affected in 2030 traffic and LOS



Greenbrier



zion

Section 3

page 3-5 .para b.

F-13 The scope of the traffic study was based on established City Guidelines for determining what intersections and segments are required for inclusion.

F-14 The scope of the traffic study was based on established City Guidelines for determining what intersections and segments are required for inclusion.

F-15 Exhibit 4.2-13, Horizon Intersection Analysis with Tierrasanta Boulevard and Santo Road Extensions, shows traffic volumes for the intersection of Greenbrier and Mission Gorge Road that omit the Mission Gorge to Greenbrier left turn volumes and the Greenbrier to Mission Gorge left turn volumes. With the installation of a traffic signal those movements would be allowed. Traffic volume from The Zion and Mission Gorge intersection would shift to the new access alternatives at Greenbrier. With a volume adjustment of 50 to 100 vehicles per hour from Zion intersection to the Greenbrier intersection, the level of service at the Green Briar Intersection would continue to operate at an acceptable level of service (LOS). All of the results and conclusions in the study would remain the same.

LETTER

RESPONSE

10.
F-16 approximately 42 feet from the southern property line. Additionally, this setback would include a fire access road and multi-use trail and would be landscaped and function as a view corridor to the San Diego River. (The environmental effects of this and other deviations from the development regulations are included in detail in Section 4.1 and 4.10 of this EIR.)
- a. How can we be certain that the multiuse path will not be closed by the property owner at some future time.
b. Will there be an easement defined on the property that will prohibit restriction of public use.
- F-17 11. Para c. The 12 ft wall will be an eyesore from the river and is inconsistent with the San Diego River Park Master Plan goals. The wall should not be used and should be replaced with a graded planted slope.
- a. What would be the number of apartments in the complex if a graded planted slope with a river access trail was to be implemented.
b. Could the height deviation of the complex be increased or less of a tiered development to recover any reduction in apartment number due to the implementation of a graded planted slope.
- F-18 12. Para d. Will the residents of the complex benefit by a reduction of electricity costs due to the installation of the solar panels or will there be other arrangements made such as selling the produced electricity to the SDG&E.
- F-19 13. Para e.
a. Will accommodations be made for large motor vehicle parking in the parking complex.
b. What will be the sizes of the parking spaces and how many of each..
- F-20 14. Para 3.4.3 What is the expected rent that relocated mobile home park residents will pay if they accept the right of first refusal to rent a unit within the proposed development.
- F-21 15. table 4.3-1
a. Please identify the pollutants and the expected parts per million expected in the mission gorge basin with the percent above or below standard for the year 2030 based upon all traffic (and industry if possible). Exclude construction pollutant since this is only temporary.
b. Based upon wind patterns, and other climatic conditions and seasons for the basin and surrounding communities please identify the air quality impacts on the surrounding residential communities of Grantville, allied gardens, Tierrasanta, and San Carlos.

Thanks
Lee Campbell

- F-16 a. A condition of the Site Development Permit No. 498703 reads: "The Owner/Permittee shall insure public access through a public access easement for the trail connection north to south, and from Mission Gorge Road west along the northerly and southerly fire access." If the property owner decides to close the path at some future time, they would be in violation of their permit and/or will be required to process an amendment to the Site Development Permit which would require the same discretionary action as its approval (in other words, would require City Council to approval/denial to amend permit).
- b. A public access easement will be placed over the fire access/path to allow public access not prohibit it. See Response to Comment F-16 a.
- F-17 The retaining wall would be either stone clad, or a color similar to the surrounding native soils, and planted and with native landscaping to provide screening for viewers along the San Diego River. As such, the EIR has concluded that it would not represent a significant impact to public views nor be inconsistent with the San Diego River Park Draft Master Plan.
- F-18 The project would include solar energy systems to reduce electricity use in all common area facilities.
- F-19 The proposed project would provide on-site parking in accordance with specifications of the City's Municipal Code parking ordinance.
- F-20 This comment can not be answered at this time and does not address the adequacy of the EIR.
- F-21 The EIR addresses air quality impacts in Section 4.3 on both a regional and local level. Standard practices are to address regional effects based on thresholds for criteria pollutants within an entire air basin (in this case the San Diego Air Basin). Localized effects are based on analysis of carbon monoxide concentrations or "hot spots". As described in 4.3.5.1a, the results of modeling indicated that carbon monoxide concentrations would not exceed federal or state standards.

LETTER G

FROM: BJ Carlton
4773 Greenbrier Ave
San Diego, CA 92120-1026

September 9, 2008

TO: bjarque@sundiego.gov
Project: ARCHSTONE-Mission Gorge

Anne B. Jarque
Environmental Planner
City of San Diego Development Services Center
122 First Avenue, MS 501
San Diego, CA 92101

Dear Anne B. Jarque,

I have read & reviewed the information on the CD that was mailed to me on the Archstone-Mission Gorge Project. I think it is too large of a project for this family oriented Allied Gardens area, and I SINCERELY HOPE YOU DO NOT PROCEED with it.

There are large parcels of land father east along Mission Gorge Road that do not have homes or mobile homes on them already and could easily hold a large project without displacing solid senior citizens who are on fixed incomes and can't afford to relocate.

- G-1
- 1) I DO NOT want to displace the fixed income seniors from their homes at the Mobile Home Park
 - 2) I DO NOT want a large development project to be made at the end of my quiet street.
 - 3) I DO NOT want the excessive noise, light pollution, and increased traffic from your proposed project: including permanently fixed night lighting, loud parties, BBQ smoke, and vehicles racing up my street.
 - 4) I DO NOT want an added traffic signal at my local intersection, Greenbrier Ave. at Mission Gorge Rd.
 - 5) I DO NOT want overflow parking to end up on my quiet street.
 - 6) I DO NOT want to see a large block type building replace the trees of the senior's mobile home park.
 - 7) I DO NOT want to compete with the already congested traffic on Mission Gorge Road.

As an example, I drove west on Mission Gorge Road to the Friars Road on ramp to Freeway 15 North at 7:30am. It took me 18 minutes to make it on to the freeway from Zion Avenue. A short distance filled with all lanes full of traffic. Adding 444 units, perhaps with 1000 residents, will certainly cause additional traffic every day. The afternoon commute from Freeway 15, east along Friars Road to Mission Gorge Road is always congested. I haven't seen the traffic counters along the road, so I know you haven't adequately addressed the traffic situation. I doubt you have "personally" sat in the morning or afternoon Mission Gorge Road traffic.

This project is simply NOT WANTED in this area.

Thank you for listening to my opinion.
Sincerely,

BJ Carlton
Greenbrier Avenue Resident

G-1 Comments noted. These statements reflect an individual's position on the proposed project and do not comment on the adequacy of the CEQA document.

LETTER

RESPONSE

LETTER H

From: ejd [sdoejd@cox.net]
Sent: Friday, September 12, 2008 10:47 PM
To: Jarque, Anne
Subject: Project # 142570

Archstone Mission Gorge:

H-1 This plan is unjust. It unduly disrupts the lives of venerable citizens who are the least capable of radical changes. The losses they will endure, and some have endured already for heart attack incidents increased when the plan was first announced (this got around the neighborhood - we know what happened), the losses they will endure will not be compensated properly - either financially or psychologically. The city is deliberately breaking a trust - the predictable (in cost, in familiarity) that these numerous senior citizens worked hard for and planned - and now sold - so a developer can earn money at the their expense! Perhaps, a just financial compensation should include not just the market value of the land, but costs of moving, of trauma associated with moving unexpectedly, cost adjustments in the new living area, cost adjustments for daily transportation differences (the distance to two supermarkets, Kaiser hospital for example) - my suspicion is that any relocation will require twice or three times the monthly income to accommodate the changed situation. Is the city prepared to compensate them on this larger scale? The taxpayers should object to any city compensation at all - with 5 billion dollars in debt. Is Archstone going to carry this burden? Is the city or state going to compel Archstone to essentially take on a supplemental pension for each of these displaced citizens? I seriously doubt anyone is going to that with any sense of just compensation embedded with a clear accountability to ensure compliance. This Archstone wrangling to wrest the property out from under these citizens smacks of a false eminent domain. We as members of the nearby community object in the strongest terms to this travesty, this rape, this robbery and this hostile takeover. The city's position on this makes us wonder when Archstone or some other outfit, will wrangle the city again to bulldoze our neighborhoods to build high rises? This is progress? Whatever happened to propriety and good neighbor relations? Don't these virtues count for something? Or are senior citizens dying anyway, so let the sharks feast on them?

NO! NO! NO! We object! WE object! WE OBJECT!

Edward J Dickinson
6880 Cartwright St
San Diego, CA 92120

H-1 Comments noted. These statements reflect an individual's position on the proposed project and do not comment on the adequacy of the CEQA document. Relocation procedures are adequately addressed in the Project Relocation Impact Report, as summarized in the EIR Section 2.6.5.5, Section 3.4.3 and Section 4.11.

LETTER I

SEP 11 2008

DEVELOPMENT SERVICES

Elva Eastman
6852 Mission Gorge Road
San Diego, CA 92120

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Dept.
1222 First Avenue, MS 501
San Diego, CA 92101-3864

Re: ARCHSTONE MISSION GORGE
Project No. 142570 SCH No. 2008021145

Dear Ms. Gallardo:

I was shocked when I received your report that your department recommended the project will not have a significant effect on the environment. What do you mean it will not have a significant effect on the environment! The mobile home park now has, on the average, one car per household. The 444 apartments that Archstone wants to build will mean that most tenants will be a two working adults which means, on the average, two cars per household. This means:

- I-1 Land Use - Quadruple the cars will be traveling on Mission Gorge Road.
- I-2 Traffic - Can you just imagine the impact that that many cars will have.
- Global Warming - Just imagine all that added traffic with all that fumes.
- Noise - It just is unimaginable to me - it's really, really bad right now.
- Public Utilities, etc. - 444 apartments with probably at least a two people household compared to 119 coaches with usually only one person household - the additional public utilities would be tremendous.

Finally, this is my home. I have a very nice, (old but nice) two bedroom (needed for my 5 grandchildren that visit me (I have 7 but two are grown), two bath home. The Park has a pool, Jacuzzi, clubhouse with a pool table (which all my grandchildren love). I could not afford any apartment or home in San Diego with two bedrooms and all these amenities.

Please think about it. What if this was your abuelita.

Elva Maria Vargas Eastman

- I-1 As described in Section 4.2 of this document, the proposed project is estimated to generate 2,670 ADT with 214 AM peak hour trips and 267 PM peak hour trips. With the removal of 119 existing mobile homes (-595 ADT) as part of redevelopment, the net trips generated by the proposed project would be 2,075 ADT with 160 AM peak hour trips and 195 PM peak hour trips. The applicant would be required to implement mitigation measures to reduce the additional traffic associated with the aforementioned 2,075 ADT increase resulting from the proposed project.

Implementation of the mitigation measures discussed in Section 4.2 of this document would reduce near term and horizon (year 2030) condition impacts to below the established thresholds. However, due to various right-of-way and other physical constraints; mitigation measures to reduce the proposed project's cumulative impacts may be infeasible. As partial mitigation for roadway impacts, the applicant would be required to make a fair share contribution towards the improvement of seven roadway segments that are not currently built to ultimate width, and would also provide and maintain a private shuttle connecting the project site to the trolley station and nearby retail services.

- I-2 See Response to Comment I-1.

LETTER

RESPONSE

LETTER 1

SEP 11 2008

DEVELOPMENT SERVICES

Elva Eastman
6852 Mission Gorge Road
San Diego, CA 92120

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Dept.
1222 First Avenue, MS 501
San Diego, CA 92101-3864

Re: ARCHSTONE MISSION GORGE
Project No. 142570 SCH No. 2008021145

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- Traffic - Can you just imagine the impact that that many cars will have.
- I-3 Global Warming - Just imagine all that added traffic with all that fumes.
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Finally, this is my home. I have a very nice, (old but nice) two bedroom (needed for my 5 grandchildren that visit me (I have 7 but two are grown), two bath home. The Park has a pool, Jacuzzi, clubhouse with a pool table (which all my grandchildren love). I could not afford any apartment or home in San Diego with two bedrooms and all these amenities.

Please think about it. What if this was your abuelita.

Elva Maria Vargas Eastman

I-3

Global warming is addressed within Section 7.15 of this document. While there are currently no published thresholds or recommended methodologies for determining the significance of a project's potential contribution to global climate change, Section 7.15.4 of this document discusses the comments recently made by the California Attorney General on the Draft Environmental Impact Report (DEIR) for the Coyote Valley Specific Plan. The Attorney General's comment states that "... by any objective standard, 500,000 metric tons per year would appear to be a considerable contribution". For the purposes of this EIR analysis, a significant impact to global climate change was considered to occur if the project were to result in greenhouse gas emissions of 100,000 metric tons CO₂ equivalent per year, consistent with the minimum greenhouse gas emission reductions anticipated by implementation of one of the CARB's early action measures.

An assessment was made to estimate the total greenhouse gas emissions that would be emitted as a result of operation of the proposed project. The three primary greenhouse gases that would be emitted by the project are CO₂, CH₄, and N₂O, and the project's emission factors are summarized in Table 7-3. Table 7-4 of the EIR shows the total projected greenhouse gas emissions, expressed as equivalent CO₂ emissions (CO₂ Eq), resulting from the proposed project. As shown in Table 7-4 of the EIR, the proposed project is projected to emit 3,582.95 metric tons of CO₂ Eq per year. This is significantly less than 100,000 metric tons per year; thus, GHG emissions due to the proposed project would be less than significant.

LETTER

RESPONSE

LETTER I

SEP 11 2008

DEVELOPMENT SERVICES

Elva Eastman
6852 Mission Gorge Road
San Diego, CA 92120

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Dept.
1222 First Avenue, MS 501
San Diego, CA 92101-3864

Re: ARCHSTONE MISSION GORGE
Project No. 142570 SCH No. 2008021145

Dear Ms. Gallardo:

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- Land Use - Quadruple the cars will be traveling on Mission Gorge Road.
- Traffic - Can you just imagine the impact that that many cars will have.
- Global Warming - Just imagine all that added traffic with all that fumes.
- 1-4 Noise - It just is unimaginable to me - it's really, really bad right now.
- 1-5 Public Utilities, etc. - 444 apartments with probably at least a two people household compared to 119 coaches with usually only one person household - the additional public utilities would be tremendous.

- 1-6 Finally, this is my home. I have a very nice, (old but nice) two bedroom (needed for my 5 grandchildren that visit me (I have 7 but two are grown), two bath home. The Park has a pool, Jacuzzi, clubhouse with a pool table (which all my grandchildren love). I could not afford any apartment or home in San Diego with two bedrooms and all these amenities.

Please think about it. What if this was your abuelita.

Elva Maria Vargas Eastman

I-4

As discussed in Section 4.2 of the EIR, the proposed project would create an additional 2,075 ADT which would incrementally increase traffic noise within the vicinity. In order to determine whether the project's incremental increase in traffic noise would be considered to significantly increase ambient noise in the vicinity, the cumulative increase can be calculated as shown in Table I-4 below. It is commonly accepted that a noise increase perceptible to human hearing is approximately 3 dBA. As shown in Table I-4, the change in ambient noise levels within the project vicinity resulting from the project's contribution to cumulative traffic noise would be well below a 3 dBA increase necessary to be perceptible to the human ear.

I-5

Section 4.4.3.1 of this document addresses project related impacts to public services. As discussed, the proposed project would result in an approximate total increase in demand for water within the Navajo community of 116,000 gallons per day, given subtraction of current on-site water demands of approximately 57,120 gallons per day for the existing mobile home park. The Sewer Study prepared in conjunction with the proposed project found that implementation of the proposed project would result in the Grantville Trunk Sewer operating at 52 percent of its total capacity during peak wastewater flow compared to its current operation of 49 percent of its total capacity.

Thus, based on these approved studies and calculations, the proposed project would result in an increase in water demand and demand for wastewater services; however, these demands can be serviced using existing City infrastructure. There would be no need for the physical alteration or extension of any water delivery or sewer facilities and there would be no significant impacts.

I-6

Comment noted.

**TABLE I-4
CUMULATIVE TRAFFIC VOLUMES AND NOISE INCREASES**

Roadway	Existing Volume (ADT)	Near-Term Volume without Project	Near-Term Volume with Project	Change in Noise Level (dB)	Year 2030 without Roadway Improvements without Project*	Year 2030 without Roadway Improvements with Project*	Change in Noise Level (dB)	Year 2030 with Roadway Improvements without Project*	Year 2030 with Roadway Improvements with Project*	Change in Noise Level (dB)
Friars Road										
I-15 Southbound to I-15 Northbound	55,980	64,810	65,430	0.04	82,120	82,740	0.03	80,120	80,640	0.03
I-15 Northbound to Rancho Mission Road	59,900	66,210	67,250	0.07	84,310	85,350	0.05	82,310	83,140	0.04
Rancho Mission Road to Santo Road	49,940	56,220	57,260	0.08	75,630	76,670	0.06	73,630	74,460	0.05
Santo Road To Riverdale Street	48,710	55,960	57,000	0.08	74,220	75,260	0.06	72,220	73,150	0.06
Riverdale Street to Mission Gorge Road	48,540	55,190	56,050	0.07	72,560	73,600	0.06	69,900	70,830	0.06
Mission Gorge Road										
Princess View Drive to Katelyn Court	Na	Na	Na	Na	Na	Na	Na	43,460	43,880	0.04
Katelyn Court to Old Cliffs Road	Na	Na	Na	Na	Na	Na	Na	47,310	47,730	0.04
Old Cliffs Road to Greenbrier Road	32,300	39,430	39,740	0.03	61,440	61,750	0.02	59,350	59,770	0.03
Greenbrier Avenue to Zion Avenue	32,000	38,830	40,390	0.17	59,540	71,100	0.11	57,120	58,570	0.11
Zion Avenue to Friars Road	42,930	49,560	51,010	0.13	68,860	70,310	0.09	65,740	67,090	0.09
Friars Road to Rainier Avenue	22,900	24,820	25,235	0.07	32,730	33,145	0.05	32,420	32,835	0.06
Rainier Avenue to Vandever Avenue	23,100	25,030	25,445	0.07	33,420	33,835	0.05	33,170	33,585	0.05
Vandever Avenue to Twain Avenue	25,740	27,710	28,125	0.06	35,610	36,025	0.05	35,290	35,705	0.05
Twain Avenue to Mission Gorge Place	29,380	31,300	31,715	0.06	39,120	39,535	0.05	38,870	39,285	0.05
Mission Gorge Place to Fairmount Avenue	29,800	31,800	32,215	0.06	39,670	40,085	0.05	39,210	39,625	0.05
Fairmount Avenue to I-8 Westbound	41,390	43,350	43,765	0.04	51,190	51,605	0.04	50,880	51,295	0.04
I-8 Westbound to I-8 Eastbound	66,010	67,510	67,820	0.02	75,230	75,540	0.02	74,760	75,070	0.02
Santo Road										
North of Friars Road	Na		Na	Na	Na	Na	Na	17,240	17,350	0.03
Princess View Drive										
North of Mission Gorge Road	Na		Na	Na	Na	Na	Na	32,670	32,780	0.01

Na = Not Available

* Roadway Improvements = Tierrasanta Boulevard and Santo Road Extensions.

LETTER

RESPONSE

LETTER J

August 26, 2008

Anne B. Jarque
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego CA 92101

Re: Archstone-Mission Gorge Project No. 142570
SCH No. 2008021145

Dear Ms. Jarque:

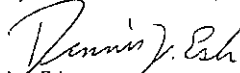
J-1 It saddens me to think that a corporation the size of Archstone could purchase and develop property presently occupied by 119 homes of 55-plus residents without considering how the Corporation is disrupting those lives. To simply notify the residents that we are no longer welcome to rent our spaces and live our lives in peace and comfort is very disheartening and cruel. I have lived at 6828-1/2 Mission Gorge Road since 2001 and had selected this location and home to live out my retirement from the City of San Diego, Parks & Recreation Department. Now, I and my neighbors have to fight for our rights all over again against Big Money developers who only see our 10 acres as profits for their organizations. The "San Diego Way of Life" is here now among the residents of the park, something we have worked hard to achieve for our waning years.

J-2 When considering the changes Archstone is proposing, keep my neighbors and me in mind and the plight we are now facing. All they propose to do will do nothing for the area of Mission Gorge Road. If anything, what they plan will all be negative and an increased burden on city services, water, sewage, and increased traffic from 440 condos, not to mention the added air and noise pollution to the area as well as the adjoining Admiral Baker Golf Course and the San Diego River.

J-3 My living condition to date has been very comfortable and affordable on my retirement income. I cannot move my home as it is too old for other parks and would not be allowed. It is, however, very stable and well maintained. In fact, all of our homes are very low maintenance. That is how they became very affordable to those of us on limited incomes.

Let us keep our mobile home park and our way of life. Put a stop to Archstone's requests right now.

Thank you.



Dennis J. Esh
6828-1/2 Mission Gorge Road, San Diego 92120

J-1 Comment noted.

J-2 Comment noted. Similar comments regarding impacts related to water, sewer, traffic, and noise are addressed in Response to Comments I-1, I-4, and I-5. Regarding "air pollution", Section 4.3 of this document analyzes projected impacts to air quality associated with the proposed project. As discussed, the proposed project would be consistent with the growth, goals, and objectives of the RAQS and SIP; would not create significant toxic or odor impacts; and would not violate any established air quality standards with the exception being during the construction phase. During the construction phase, ROG emissions could exceed allowed levels. Thus, the project would be required to utilize an architectural coating with a VOC content no greater than 90 grams per liter and an interior architectural coating with a VOC content no greater than 50 grams per liter in order to ensure that ROG emissions stay within allowable levels.

J-3 Comment noted.

LETTER

RESPONSE

LETTER K

Project: Archstone-Mission Gorge
Community Plan Area: Navajo

Project # 142570, SCH# 2008021145
District: 7

How Is It, *Too Much*, Is Not Enough?

Gloria Hanson, MVV Resident

- K-1 Archstone Smith Fenton Park complex has 396 luxury apartments. Near by, Portifino has 736 units and Monte Vista has several hundred. La Mirage has a whopping 1410 units! That's about 3000 apartment units within an approximate 1-1/2 mile stretch of roadway! Inquiry at the rental office of each of these complexes confirms there are many vacancies at all of these locations, further substantiated by signs, at each, indicating they are "now renting." With so many empty units available, why do we need more?
- K-2 Redevelopment plans, if approved, will bring an additional 4,500 units of housing at Quarry Falls. Superior Ready Mix is planning 2,500 units in the redevelopment of their land. The 27 acres just west of the Superior Ready Mix property— is another development that will add 1,500 units. That is 8,500 new housing units! (Mostly apartments.)...almost triple the number of existing units (3000 indicated above) that already clog the road system. Quarry Falls alone is expected to add 66,000 road trips per day! That's 66-thousand!
- K-3 In addition to these thousands of housing units, there are at least five career centers and several strip malls planned; all adding to the traffic nightmare, which is to come; some say, is already here. Even though this all has a staggering impact on emergency services, the environment, and our already faltering infrastructure—and for those reason should not be allowed into existence—that is not the main point I wish to make here. There are many other apartment complexes along Friars Road to add to the mix of these thousands of units and yet there is no provision for senior living, except at Mission Valley Village and The Cliffs mobile home parks.
- K-4 The 3,000 existing apartments plus 8,500 new units is a total of 11,500 units in just a few short miles of road! *Now if that is not enough*, Archstone Smith wants to close Mission Valley Village (Senior) Mobile Home Park (Which is not included in the Grantville redevelopment plan.) and replace it with 445 luxury apartments. We DO NOT NEED more luxury apartments. We do, however, need to increase, NOT DECREASE, housing for the fast growing demographic; our senior citizens. These people served the community well in their day and now deserve the dignity of housing that is affordable on their often fixed income.
- K-5 There is no need for the Archstone Mission Gorge development other than the increase to the tax base it will generate for the financially troubled City of San Diego. Why should the seniors in this park be asked to bare that burden? These homes are the only assets most of them have. Our city's forefathers, in their wisdom, put an Over Lay Zoning Ordinance in place to protect this form of affordable housing. However, corporate greed and shortsighted city officials are considering closing the park to promote a project that has no grass root support. If it is "tax base" the city wishes to increase, MVV is able—this very day—to add 35 new homes. Manufactured homes are subject to property taxes the same as any stick-built house; income for the city and affordable housing for seniors. What is wrong with WIN / WIN?



Above: Sample of new manufactured home

- K-6 Please stop viewing this as one small project and please start to see it as part of the big redevelopment picture. Archstone knew they were purchasing a mobile home park when they bought this land, and they knew it was protected by the Over Lay. There is no need for another 445 luxury apartments. While Archstone has committed to 20% affordable units to house the displaced seniors, it is necessary that someone start to understand that a multi-family complex is not appropriate placement of seniors. Help us by saying no to Archstone.

K-1 Comment noted.

K-2 Quarry Falls and the Superior Ready Mix projects, along with other past, present and reasonably foreseeable projects were taken into consideration in the analysis of cumulative impacts as discussed in Section 7 of the EIR.

K-3 Comment noted.

K-4 Comment noted. As discussed further below in Response to Comment N-5, the proposed project would include 20% affordable housing units that would be suitable as senior units.

K-5 Comments noted.

K-6 Comments noted. These statements reflect an individual's position on the proposed project and do not comment on the adequacy of the CEQA document.

LETTER L

8/15/08

Re: Archstone - Mission Gorge
 Project #142520 Sub. #2008021145
 Community Plan Area: Navajo
 Council District?

L-1

We are firmly and aggressively
 against this project. We live on
 block from Mission Gorge Road.
 Our area cannot withstand
 this kind of environmental
 impact.
 Our vote is no!!

Robert & Eleanor Hooten
 4749 Greenbriar Ave.
 San Diego Ca. 92120

L-1 Comment noted.

LETTER

RESPONSE

LETTER M

Project: Archstone-Mission Gorge
Community Plan Area: Navajo

Project # 142570, SCH# 2008021145
District: 7

M-1 It is exceedingly obvious just how ill-advised *mega-growth* is along (or even near) Mission Gorge Road. In reviewing the EIR for Archstone-Mission Gorge it is telling that the issue of increased traffic resulting from this *proposed* project has been listed as not able to be mitigated. Yet, with a simple payment of money, Archstone could be allowed to build the project anyway. This is scandalous!

M-2 Archstone-Mission Gorge would be the fruit of that corporation's greedy "land grab" and its attempt to impose itself with yet another unneeded luxury apartment complex. Small as it would be (445 units) it would still present serious problems to the environment. But forget these problems, for the moment.

M-3 For now, let's consider the city's plans for redevelopment. Allow all the Mission Valley area development plans to be considered at once. *River Park* (previously Superior Ready Mix) is promising 2,500 housing units and light industry or a commercial center. The 27 acres (*not yet named*) west of the Superior property plans a mix of housing and commercial use of that property of several hundred units. *Quarry Falls* is expected to add 4,500 units, as many as five corner centers, and several strip malls. And there are plans for even more development near Mission Gorge Road & Fairmount Avenue near 1-8. Have you done the math? That's well over 10,000 housing units and industrial/commercial use increases for an area that teeters on traffic gridlock daily. *Quarry Falls* alone is estimated to add 66,000 road trips per day!

M-4 THINK ...If a mere 445 units leaves traffic unmitigated how can 10,000 units possibly be justified?

Now, let's go back to the 445 (Archstone-Mission Gorge) units...

- a)1. This small (by comparison) project, when considered alone, leaves traffic unmitigated.
- b)2. Archstone-Mission Gorge is not part of the city's planned development.
- c)3. Archstone-Mission Gorge does not have grassroots support.
- d)4. Archstone-Mission Gorge would tear down 119 manufactured homes (which are affordable to seniors) and replace them with luxury apartments. Even if they could afford the new units (most cannot) this style of housing is not appropriate to the special needs of seniors; e.g. stairs, distant parking, isolation, etc.
- e)5. They will callously displace those seniors to...to where? There is not so much affordable *senior living accommodations* that the city can justify its approval for the destruction of even one of these existing units!

CONSIDER ...Let the city plan its redevelopment wisely.

1. Keep to the city's plan.
2. Pare down as necessary.
3. Work out the traffic first.
4. FIRST!
5. Period.

Then, when all is well *months or years after* completion, and traffic is proved to be manageable, then (and only then) entertain the possibility of *further growth* by any private developer.

FINALLY ...Reread this letter while substituting "water" or "air quality" or any of the other concerns brought out in the EIR in place of the word "traffic" and my plea will be the same...Please, DO NOT allow Archstone-Mission Gorge to proceed. Even as the smallest of the projects it has unmitigated problems. However, the environmental impacts of all the projects MUST be viewed as cumulative!

I repeat... It is exceedingly obvious just how ill-advised *mega-growth* is!

Thank you for your consideration in this matter,
Mary (Tracy) Quindoy, MVV Resident

M-1 Section 4.2 of the EIR addresses project related traffic impacts and mitigation. Implementation of mitigation measures would reduce existing and future traffic conditions to below established thresholds. However, due to various right-of-way and other physical constraints; mitigation measures to reduce the proposed project's cumulative impacts may be infeasible. As partial mitigation for roadway impacts, the applicant would be required to make a fair share contribution towards the improvement of seven roadway segments that are not currently built to ultimate width, and would also provide and maintain a private shuttle connecting the project site to the trolley station and nearby retail services.

M-2 Comments noted. These statements reflect an individual's position on the proposed project and do not comment on the adequacy of the CEQA document.

M-3 Section 7.0 of the EIR addresses cumulative impacts of the project, including any subsequent projects. According to Section 15130(b)(1) of the CEQA Guidelines, the discussion of cumulative effects is to be on "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency." Table 7-1 of section 7.0 shows the past, present, and probable future projects considered in this cumulative effects evaluation.

M-4 See Response to Comment M-3.

LETTER M

Project: Archstone-Mission Gorge
Community Plan Area: Navajo

Project # 142570, SCH# 2008021145
District: 7

It is exceedingly obvious just how ill-advised *mega-growth* is along (or even near) Mission Gorge Road. In reviewing the EIR for Archstone-Mission Gorge it is telling that the issue of increased traffic resulting from this *proposed* project has been listed as not able to be mitigated. Yet, with a simple payment of money, Archstone could be allowed to build the project anyway. This is scandalous!

Archstone-Mission Gorge would be the fruit of that corporation's greedy "land grab" and its attempt to impose itself with yet another unneeded luxury apartment complex. Small as it would be (445 units) it would still present serious problems to the environment. But forget these problems, for the moment.

For now, let's consider the city's plans for redevelopment. Allow all the Mission Valley area development plans to be considered at once. *River Park* (previously Superior Ready Mix) is promising 2,500 housing units and light industry or a commercial center. The 27 acres (not yet named) west of the Superior property plans a mix of housing and commercial use of that property of several hundred units. *Quarry Falls* is expected to add 4,500 units, as many as five career centers, and several strip malls. And there are plans for even more development near Mission Gorge Road & Fairmount Avenue near 1-8. Have you done the math? That's well over 10,000 housing units and industrial/commercial use increases for an area that teeters on traffic gridlock daily. *Quarry Falls* alone is estimated to add 66,000 road trips per day!

THINK ...If a mere 445 units leaves traffic unmitigated how can 10,000 units possibly be justified?

M-5 Now, let's go back to the 445 (Archstone-Mission Gorge) units...

- a) 1. This small (by comparison) project, when considered alone, leaves traffic unmitigated.
- b) 2. Archstone-Mission Gorge is not part of the city's planned development.
- c) 3. Archstone-Mission Gorge does not have grassroots support.
- d) 4. Archstone-Mission Gorge would tear down 119 manufactured homes (which are affordable to seniors) and replace them with luxury apartments. Even if they could afford the new units (most cannot) this style of housing is not appropriate to the special needs of seniors; e.g. stairs, distant parking, isolation, etc.
- e) 5. They will callously displace those seniors to...to where? There is not so much affordable *senior living accommodations* that the city can justify its approval for the destruction of even one of these existing units!

M-6 **CONSIDER** ...Let the city plan its redevelopment wisely.

1. Keep to the city's plan.
2. Pare down as necessary.
3. Work out the traffic first.
4. FIRST!
5. Period.

M-7 Then, when all is well *months or years after* completion, and traffic is proved to be manageable, then (and only then) entertain the possibility of *further growth* by any private developer.

M-8 **FINALLY** ...Reread this letter while substituting "water" or "air quality" or any of the other concerns brought out in the EIR in place of the word "traffic" and my plea will be the same...Please, **DO NOT** allow Archstone-Mission Gorge to proceed. Even as the smallest of the projects it has unmitigated problems. However, the environmental impacts of all the projects **MUST** be viewed as cumulative!

M-9 I repeat... It is exceedingly obvious just how ill-advised *mega-growth* is!

Thank you for your consideration in this matter.
Mary (Tracy) Quindoy, MVV Resident

M-5 a) See Response to Comment N-1.

b) Comment noted.

c) Comment noted.

d) See Response to Comment N-5. The proposed project would include 20% affordable housing units that would be suitable as senior units.

e) See Response to Comment N-5. Relocation procedures are adequately addressed in the project Relocation Impact Report, as summarized in the EIR Section 2.6.5.5, Section 3.4.3 and Section 4.11.

M-6 Comment noted.

M-7 Comment noted.

M-8 Comment noted.

M-9 Comment noted.

LETTER N

From: jacks64@netzero.net [mailto:jacks64@netzero.net]
Sent: Tuesday, September 02, 2008 9:02 AM
To: Jarque, Anne
Subject: ARCHSTONE-MISSION GORGE PROJECT NO. 142570

Project: Archstone-Mission Gorge

Project No. 142570, Sch No. 2008021145

N-1 After reading the EIR on the proposed Archstone-Mission Gorge project, I am against the community plan amendment and rezone to remove the site from the Mobile Home Park Overlay Zone for a medium hi-density residential project (444 units) being propose on the west side of Mission Gorge Road with entrance to the project from Greenbrier Avenue for the following reasons: (1) Traffic, (2) Noise/Air Quality, and (3) Landed Use

TRAFFIC/signal light on Greenbrier Ave/Mission Gorge Road

N-21. During peak hours of traffic, Mission Gorge Road is slowly becoming a parking lot. As development continues, the traffic on Mission Gorge Road will come to a stand still. Residence of Del Cerro, San Carlos, Santee, and even El Cajon use Mission Gorge Road and the streets of Allied Gardens to avoid the I-8, I-15 gridlock. Currently, the median along Mission Gorge Road has curtailed the traffic on Greenbrier Avenue; however, during peak hours of traffic and weekends more and more vehicles are using Greenbrier Avenue to avoid the slow moving traffic on Zion Avenue. I have concerns that Greenbrier Avenue will turn into a speedway. When you cross Greenbrier Avenue or back out of your driveway the drivers do not even stop. The drivers just cross the double yellow line, pass you on the right or left to avoid slowing down. Greenbrier Avenue posts a 20 mph speed limit. Vehicles west and east on Greenbrier Avenue ignore the 20 mph limit. I have called the Police Department in regards to the speeding, but the Police have more pressing duties than monitor traffic.

N-3 There have been five separate accidents involving vehicles traveling Greenbrier Avenue. Each accident, the driver was speeding, lost control of the vehicle, and ran from the scene of the incident. The following properties sustained damage:

- (1) 6801 Newberry Street (corner of Greenbrier Avenue), vehicle crashed through a block wall.
- (2) 6802 Newberry Street (corner of Greenbrier Avenue), a parked was hit,
- (3) 4819 Greenbrier Avenue, a vehicle crashed through the residence fence, and stopped in the backyard, missing the house,
- (4) 6808 Newberry Street (2nd house from Greenbrier Avenue), a parked car was tree was hit, and
- (5) 4785 Greenbrier Avenue, a vehicle was traveling west on Greenbrier Avenue, lost control, and

09/02/2008

N-1 Comment noted.

N-2 Comment noted.

N-3 Comment noted. Old Cliff's Road does not align with any portion of the project frontage. A U-turn would be required at Old Cliff's Road to serve the project. This was addressed in the traffic study and EIR.

crashed in a block retaining wall.

Archstone stated in 9.1.3 they want to reduce the traffic impact on Mission Gorge Road; however, installing a traffic signal on Mission Gorge Road and Greenbrier Avenue would solve Archstone entrance problem, however, more vehicles will be traveling Greenbrier Avenue, thus increasing traffic, encourage speeding and putting residence at risk. If the 444 unit complex is approved, Archstone should redesign it's entrance to use Old Cliff's Road, or be a good neighbor by reducing the project size to 200 multi-family units, thus leaving the Mission Gorge Road median as is and keep the stop sign at Greenbrier Avenue.

NOISE/AIR QUALITY

N-4 Fifteen years ago, I could sit on my patio, enjoy the sunset, open my windows, let the evening breeze cool down my house, relax in bed, and breathe the wonderful night air. Now, I no longer sit on the patio and I do not open my windows. The AC runs all summer longer. The volume of vehicles that travel Mission Gorge Road deposit a black fine dust (rubber wearing from car tires) that clings to patio furniture, plants, concrete, sidewalks, windows etc. The air is just unhealthy. The dirty air and noise from traffic will only worsen as large developments like Archstone, jockey for position along Mission Gorge Road. Archstone should scale down its project, or retain the Mobile Home Park.

LAND USE

N-5 Removing the Mobile Home Park Overlay would leave approximately 119 seniors without affordable housing. Even though Archstone states they would apy for the relocation costs, the trailers are too old to more or sell. In addition, a city Engineer stated contaminates drain from the Mobile Home Park into the San Diego River. If so, why was the problem not corrected by the previous landowner's? Suddenly, the problem is fixable by removing the Mobile Home Park Overlay and letting Archstone build it's massive project??? In addition, Archstone is proposing affordable housing. To justify their need to build 444 units, Archstone is using the buzzword "affordable housing". To accomplish their goal of 444 units, Archstone is asking for a waiver to exceed the building height limits established by the existing RM3-7 Zone (a maximum of 45 feet), and reduce the landscaping to a minimum; all this, so the proposed Archstone project can offer ffordable housing. Hm. Well, the Mobile Home Park offers affordable housing. Archstone should scale down te project or retain the Mobile Home Park. The proposed project is too massive to face Greenbrier Avenue. The reduced project alternative 9.3 i acceptable.

SUMMARY

N-6 The residence of Allied Gardens and the Mobile Home Park to not have the lawyers and staff that Archstone retains. You can easily justify a project with buzzwords and promises. If you look around San Diego, Archstone projects all look alike. The building are painted in earth tones colors and accented with stone; units are four stories high and very little landscape. The Archstone projects remind me of building blocks, on block stacked on top of each other.

Mission Gorge Road offers wonderful possibilities, but the proposed Archstone project is just awful. Maybe attached homes would be a better fit.

Thank you,

Cynthia J Steed, 6802 Newberry Street, San Diego, CA 92120

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N-4 Comment noted.

N-5 The City adopted an affordable housing ordinance in 2003, which was added to the Municipal Code as the Inclusionary Affordable Housing Regulations (Municipal Code, Section 142.1300 et seq.). The ordinance generally applies to developments of two or more dwelling units and requires that 10 percent of the total dwelling units in the proposed development be affordable to targeted rental households or targeted ownership households. The proposed Archstone - Mission Gorge project proposes to go beyond the 10 percent required by providing 20 percent of the project with affordable housing units.

As discussed in Section 4.11 of this document, and as required by California Government Code (Section 65863.7 et seq.) a Relocation Impact Report (RIR) was been prepared to report on the impact of the conversion upon the displaced tenants of the mobile home park and mitigate the adverse impact of the park closure. The RIR addresses current demographics of the existing mobile home park and the vicinity, evaluation of housing availability and affordability, including availability and affordability of mobile home parks spaces within other mobile home parks, and identification of relocation opportunities and assistance measures. While the proposed project would displace mobile home units, the existing mobile housing would be replaced with 444 rental condominium units, 20 percent of which would be affordable housing units. The RIR concluded that there is ample housing available in San Diego and other nearby communities for the tenants of the mobile home park comparable to the Mission Valley Village and that displacement of on-site tenants would not necessitate the construction of new housing elsewhere.

N-6 Comments noted. These statements reflect an individual's position on the proposed project and do not comment on the adequacy of the CEQA document.

LETTER

RESPONSE

Page 3 of 3

Rose M. Steed, 4819 Greenbrier Avenue, San Diego, CA 92120

Please note my mother (Rose) is 83 years old, sight is going extra, but she combined her comments with mine.

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Page 1 of 1
LETTER O

From: Dr. Jerry L. Thomas [mailto:paradoxinsd@cox.net]
Sent: Thursday, August 21, 2008 9:28 AM
To: Jarque, Anne
Subject: EIR Project # 142570 SCH # 2008021145

Mission Gorge Project

Please consider:

- O-1 1) The Height of said project. The is NO OTHER structure that is over two stories high in the area. This project directly affects the view of the Allied Gardens neighborhood. The project should be no higher than Mission Greens - and that is two stories.
- a) Due to the proposed height, some thought should be given to the lighting and glare that will impact Allied Gardens.
- O-2 2) Low cost housing. As it stands, there is already low cost housing provided at the now existing trailer park.
- O-3 3) Water. As it stands, the trailer park consumes water for 119 units. The proposal is for 444 units. That is FOUR TIMES what is there now. Just where do expect to get four times the water for this project as we are in a stage 1 water emergency?
- O-4 4) Traffic. You are going to put EIGHT TIMES the amount of cars on the road. The streets are in poor condition already.
- a) Air quality will be significantly impacted.

Re-think this project.

Dr. J.L. Thomas
4791 Greenbrier Ave.
San Diego, CA 92120-1026

- O-1 Within the project area, there are, in fact, 3 and 4-story structures as described in Section 4.10 of the EIR. Impacts to visual quality related to height and light and glare were analyzed in EIR Section 4.10 and concluded to be less than significant ...
- O-2 Comment noted. As described in the EIR, the proposed project would provide 20% of the units to be affordable housing units. Qualifications would be in accordance with Housing Commission requirements.
- O-3 As stated in the EIR Section 4.4, the projected average day water demand for the Archstone-Mission Gorge Project is 173,160 million gallons per day, compared to 57,120 mgd under existing conditions. The estimated 116,000 gallons per day increase in water demand is not four times as much water as the current condition as stated in the comment. The project incorporates water conservation measures such as native and drought-tolerant landscaping, low-flow water fixtures, reclaimed water for irrigation, and replacement of existing water and sewer facilities with current efficient technologies that could minimize the maximum water use anticipated for the site.
- O-4 Comment noted. As analyzed in the EIR Traffic Section 4.2, the projected average daily traffic (ADT) associated with implementation of the Archstone-Mission Gorge Project would be 2,075 compared to 595 under existing conditions, an approximate increase by four times. Traffic and air quality impacts were evaluated in the EIR.

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LETTER

RESPONSE

LETTER P

9/12/08


Re: Project 142570 Archstone Mission Gorge EIR

P-1 I do not believe your report properly addresses the significant impact to our shrinking water supply (which will be raised to level 2 in November) and the traffic impact.

We are currently being asked to limit our water supply. How can you justify more development when the supply is already in jeopardy? The mayor is poised to raise the condition to level 2 in November 2008.

P-2 You only address the significant traffic impact to this area in terms of normal daily trips. What about when we have a wild fire, earthquake, or other disaster?

The truth is you can't address these and this project should *not* go through.


Linda J. Wilson
7792 Mockingbird Dr.
San Diego, CA 92123
858-279-5990

P-1 The project's impact on water use was analyzed and discussed in Section 4.4 of the EIR. The project is not considered a "water-demand project" under CEQA Statute Section 15155, and therefore the lead agency's preparation of a water supply assessment would not have been required.

P-2 The scope of the traffic analysis was based on established City Guidelines. A determination of traffic impacts during a disaster would be speculative.

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Final Environmental
Impact Report for the
Archstone - Mission
Gorge Project
Project Number 142570
SCH No. 2008021145

September 24, 2008

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TABLE OF CONTENTS

Acronyms	vii
Executive Summary	S-1
1.0: Introduction	1-1
1.1 EIR Intended Use and Purpose	1-2
1.2 EIR Legal Authority	1-2
1.3 EIR Review Process	1-3
1.4 EIR Scope and Content	1-5
2.0: Environmental Setting	2-1
2.1 Regional Setting	2-1
2.2 Project Location	2-1
2.3 Existing Physical Characteristics	2-5
2.4 Existing Land Uses	2-10
2.5 Public Infrastructure	2-12
2.6 Planning Context	2-18
2.7 Changing Trends	2-36
3.0: Project Description	3-1
3.1 Project Background	3-1
3.2 Project Objectives	3-1
3.3 Discretionary Actions	3-2
3.4 Project Features	3-8
3.5 Off-site Components	3-32
3.6 Environmental Design Considerations	3-33
3.7 History of Project Changes	3-37
4.0: Environmental Analysis	4-1
4.1 Land Use	4.1-1
4.2 Traffic/Circulation/Parking	4.2-1
4.3 Air Quality	4.3-1
4.4 Public Utilities	4.4-1
4.5 Cultural/Historical Resources	4.5-1
4.6 Noise	4.6-1
4.7 Biological Resources	4.7-1
4.8 Water Quality	4.8-1
4.9 Hydrology	4.9-1
4.10 Visual Effects and Neighborhood Character	4.10-1
4.11 Population and Housing	4.11-1
4.12 Geology and Soils	4.12-1
4.13 Public Services	4.13-1
4.14 Public Health and Safety/Hazardous Materials	4.14-1

TABLE OF CONTENTS (cont.)

5.0: Significant Unavoidable Environmental Effects/ Significant Irreversible Environmental Changes	5-1
5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented	5-1
5.2 Irreversible Environmental Changes Which Would Result if the Project Is Implemented	5-1
6.0: Growth Inducement	6-1
6.1 Population and Growth Projections	6-1
6.2 Development Features	6-2
7.0: Cumulative Impacts	7-1
7.1 Land Use	7-5
7.2 Traffic/Circulation/Parking	7-6
7.3 Air Quality	7-6
7.4 Utilities	7-8
7.5 Cultural/Historical Resources	7-10
7.6 Noise	7-10
7.7 Biological Resources	7-11
7.8 Water Quality	7-11
7.9 Hydrology	7-12
7.10 Visual Effects and Neighborhood Character	7-12
7.11 Population and Housing	7-12
7.12 Geology and Soils	7-13
7.13 Public Services	7-14
7.14 Public Health and Safety	7-14
7.15 Global Warming/Greenhouse Gases	7-14
8.0: Effects Found Not to be Significant	8-1
8.1 Agricultural Resources	8-1
8.2 Mineral Resources	8-1
8.3 Paleontological Resources	8-1
9.0: Alternatives	9-1
9.1 Alternatives Considered by Rejected	9-2
9.2 No Project Alternative	9-5
9.3 Reduced Project Alternative	9-13
9.4 Alternate Evaluation/Environmentally Superior Alternative	9-18
10.0: Mitigation Monitoring and Reporting Program	10-1
11.0: References Cited	11-1
12.0: Individuals and Agencies Consulted	12-1
13.0: Certification Page	13-1

TABLE OF CONTENTS (cont.)

FIGURES

2-1:	Regional Location	2-2
2-2:	Project Location on USGS Map	2-3
2-3:	<i>Project Location on Aerial Photograph</i>	2-4
2-4:	Existing Topography and San Diego River Floodplain	2-6
2-5:	Existing Land Use	2-11
2-6:	General Plan Land Use	2-21
2-7:	General Plan Village Propensity	2-22
2-8:	Navajo Community Plan Land Use and Overlays	2-24
2-9:	Mission Trails Design District	2-27
2-10:	San Diego River Park Draft Master Plan	2-28
3-1:	Proposed Site Development Plan/Vesting Tentative Map	3-9
3-2:	Proposed Site Development Plan Phase 2 Condition	3-11
3-3:	Proposed Open Space Calculations	3-13
3-4:	Proposed Building Elevation – North	3-15
3-5:	Proposed Building Elevation – East	3-16
3-6:	Proposed Building Elevation – South	3-17
3-7:	Proposed Building Elevation – West	3-18
3-8:	Proposed Primary Entry	3-20
3-9:	Proposed Fence and Retaining Wall	3-21
3-10:	Proposed Landscape Development Plan	3-23
3-11:	Proposed Landscape Development Plant Palette	3-24
3-12:	Proposed Courtyard Detail: River Court, Dry Stream Court and Native Court	3-26
3-13:	Proposed Courtyard Detail: Flume Court, Orchard Court and Open Green Court	3-27
3-14:	Proposed Grading Development Plan	3-31
4.1-1:	MHPA in Project Vicinity	4.1-6
4.2-1:	Existing Traffic Volumes	4.2-2
4.2-2:	Near-term and Long-term Project Description without Tierrasanta Boulevard and Santo Road Extensions	4.2-12
4.2-3:	Long-term Project Description with Tierrasanta Boulevard and Santo Road Extensions	4.2-18
4.2-4:	Near-term and Long-term Project Trip Assignment without Tierrasanta Boulevard and Santo Road Extensions	4.2-19
4.2-5:	Long-term Project Trip Assignment with Tierrasanta Boulevard and Santo Road Extensions	4.2-20
4.2-6:	Near-term Traffic Volumes	4.2-22
4.2-7:	Near-term Traffic Volumes with Project	4.2-24
4.2-8:	Horizon Year without Tierrasanta Blvd. and Santo Road Extensions	4.2-29
4.2-9:	Horizon Year with Tierrasanta Blvd. and Santo Road Extensions with Project Traffic Volumes	4.2-30
4.2-10:	Horizon Year with Tierrasanta Blvd. and Santo Rd. Extensions Traffic Volumes	4.2-31
4.2-11:	Horizon Year with Tierrasanta Blvd. and Santo Rd. Extensions with Project Traffic Volumes	4.2-32

TABLE OF CONTENTS (cont.)

FIGURES (cont.)

4.2-12: Required Mitigation Measures at the Project Access	4.2-47
4.3-1: Link and Receptor Network for a Single Intersection with Dedicated Left-turn Lanes	4.3-17
4.5-1: Area Recommended for Archaeological Monitoring	4.5-8
4.6-1: Noise Measurement Locations	4.6-4
4.6-2: Future Projected Traffic Noise Contours	4.6-9
4.6-3: Modeled Receivers	4.6-10
4.6-4: Buildings Exceeding 60 CNEL	4.6-13
4.7-1: Biological Resources	4.7-2
4.10-1: Existing Site Photographs Key Map	4.10-2
4.10-2: Existing Site Photographs Looking from the Northeast Corner	4.10-3
4.10-3: Existing Site Photographs Looking from the Southeast Corner	4.10-4
4.10-4: Existing Site Photographs Looking from the Southwest Corner	4.10-5
4.10-5: Photosimulations Key Map	4.10-19
4.10-6: Photosimulation View 1 from East on Greenbrier Avenue	4.10-20
4.10-7: Photosimulation View 2 from South on Mission Gorge Road	4.10-21
4.10-8: Photosimulation View 3 from North on Mission Gorge Road	4.10-22
4.10-9: Photosimulation View 4 from North on Golf Course	4.10-24
4.10-10: Photosimulation View 5 from South on Golf Course	4.10-25
4.10-11: Retaining Wall Landscape Detail	4.10-31
4.10-12: Primary Entry Perspective from Mission Gorge Road	4.10-36
4.10-13: Plan View of Primary Entry	4.10-37
4.12-1: Geologic Map	4.12-2
9-1: Reduced Project Alternative Conceptual Site Plan	9-15

TABLES

S-1: Summary	S-8
2-1: Fire Station Response Times	2-15
2-2: Police Response Times	2-17
3-1: Archstone – Mission Gorge Development Summary	3-8
4.1-1: Summary of Project Consistency with Applicable Land Use Plans and Objectives	4.1-17
4.2-1: Existing Intersection LOS Analysis	4.2-5
4.2-2: Existing Roadway Segment Conditions	4.2-7
4.2-3: Existing Arterial Segment Analysis	4.2-8
4.2-4: Existing Peak Hour Ramp Metering Delays	4.2-9
4.2-5: Project Trip Generation	4.2-17
4.2-6: List of Cumulative Projects Used to Estimate the Traffic Volumes Generated by Cumulative Projects	4.2-21
4.2-7: Near-Term (2010) Intersection LOS Analysis	4.2-23
4.2-8: Near-Term (2010) Roadway Segment Analysis	4.2-26
4.2-9: Near-Term (2030) Arterial Segment Analysis	4.2-28
4.2-10: Horizon (2030) Intersection LOS Analysis Without Tierrasanta Boulevard and Without Santo Road Extensions	4.2-33

TABLE OF CONTENTS (cont.)

TABLES (cont.)

4.2-11:	Horizon Year (2030) Roadway Segment Analysis Without Tierrasanta Boulevard and Without Santo Road Extensions	4.2-36
4.2-12:	Horizon Year (2030) Arterial Segment Analysis Without Tierrasanta Boulevard and Santo Road Extensions	4.2-38
4.2-13:	Horizon (2030) Intersection LOS Analysis With Tierrasanta Boulevard and With Santo Road Extensions	4.2-39
4.2-14:	Horizon Year (2030) Roadway Segment Analysis With Tierrasanta Boulevard and With Santo Road Extensions	4.2-41
4.2-15:	Horizon Year Arterial Segment Analysis (2030) With Tierrasanta Boulevard and With Santo Road Extensions	4.2-43
4.2-16:	Near-Term Peak Hour Ramp Metering Delays Without Tierrasanta Road and Santo Road Connections	4.2-52
4.2-17:	Horizon Peak Hour Ramp Metering Delays Without Tierrasanta Road and Santo Road Connections	4.2-53
4.2-18:	Horizon Peak Hour Ramp Metering Delays With Tierrasanta Road and Santo Road Connections	4.2-55
4.2-19:	Proposed Project Parking	4.2-56
4.3-1:	Ambient Air Quality Standards	4.3-2
4.3-2:	Ambient Air Quality Summary – San Diego Air Basin	4.3-6
4.3-3:	Summary of Air Quality Measurements Recorded at the San Diego—Overland Avenue Monitoring Station	4.3-7
4.3-4:	Summary of Worst-Case Construction Emissions Without Mitigation	4.3-12
4.3-5:	Summary of Worst Case Construction Emissions With Mitigation	4.3-13
4.3-6:	Project (Year 2010) Average Daily Emissions to the San Diego Air Basin	4.3-14
4.3-7:	Traffic-Related CO Concentrations	4.3-19
4.6-1:	15-Minute Traffic Counts	4.6-3
4.6-2:	Measured Noise Levels of Common Construction Equipment	4.6-6
4.6-3:	Year 2030 Roadway Traffic Parameters	4.6-8
4.6-4:	Future Project Exterior Noise Levels	4.6-11
4.9-1:	Runoff Coefficients	4.9-2
4.9-2:	Summary of Pre-Project and Detained Post-Project Peak Flows	4.9-3
4.12-1:	Seismic Parameters of Nearby Faults	4.12-3
4.13-1:	Schools Enrollment and Capacity	4.13-2
4.13-2:	Parks by Classification	4.13-3
4.13-3:	Potential Student Generation	4.13-5
7-1:	List of Projects In Vicinity Used to Evaluate Cumulative Effects	7-2
7-2:	Global Warming Potentials (GWP) and Atmospheric Lifetimes (Years) Used in the Inventory	7-15
7-3:	GHG Emission Factors	7-22
7-4:	Greenhouse Gas Emissions	7-23
9-1:	Matrix Comparison of the Proposed Archstone – Mission Gorge Project and Alternatives	9-19

TABLE OF CONTENTS (cont.)

APPENDIXES (bound under separate cover)

- A: Notice of Preparation and Comments
- B: Public Service Letters
- C: FAA Determination
- D: Traffic Impact Analysis
- E: Air Quality Technical Report
- F: Sewer Study
- G: Waste Management Plan
- H: Cultural Resources Technical Report
- I: Noise Technical Report
- J: Biological Resources Technical Report
- K: Water Quality Technical Report
- L: CEQA Drainage Study
- M: Mobile Home Park Relocation Impact Report
- N: Geotechnical Report
- O: Phase I Environmental Site Assessment

LIST OF ACRONYMS AND ABBREVIATIONS

µg/m ³	micrograms per cubic meter
ac	acre
ACM	Asbestos Containing Materials
ADD	Assistant Deputy Director
ADRP	Archaeology Data Recovery Program
ADT	Average daily (vehicle) trips
AIA	Airport Influence Area
APCD	San Diego Air Pollution Control District
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
ALS	Advanced Life Support
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AME	Archaeology Monitoring Exhibit
AMI	Average median income
AMSL	Above mean sea level
APE	Area of potential effect
APN	Assessor's parcel number
BFPDs	Back Flow Prevention Devices
BI	Building Inspector
BMPs	Best management practices
BRG	Biological Resource Guidelines
C	Runoff coefficient
CAA	Clean Air Act
CalEPA	California Environmental Protection Agency
CALINE	California Line Source Model
CAL-IPC	California Invasive Plant Council
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAP	Climate Change Action Plan
CCP	Cities for Climate Protection
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFC	Chlorofluorocarbons
cfs	Cubic feet per second
CH ₄	Methane
CIP	Capital Improvement Project
CM	Construction Manager
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CPA	Community plan amendment

List of Acronyms and Abbreviations

CPIOZ	Community Plan Implementation Overlay Zone
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CSVR	Consultant Site Visit Record
CUP	Conditional Use Permit
CWA	Clean Water Act
dB	Decibels
dB(A)	A-weighted decibels
DIF	Development impact fee
DOE	Department of Energy
du	Dwelling unit
EAS	Environmental Analysis Section (of the City of San Diego, ESD)
EB	Eastbound
ED	Entitlements Division
EIR	Environmental Impact Report
EMS	Emergency Medical Services
EMTs	Emergency Medical Technicians
EO	Executive Order
EPA	Environmental Protection Agency
Eq	Equivalent (or equivalence)
ERM	Environmental Review Manager
ERMS	Emergency Response Management System
ESA	Endangered Species Act
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
°F	Degrees Fahrenheit
FAA	Federal Aviation Administration
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Federal Insurance Rate Maps
FPF	Floodplain Fringe
FW	Floodway
GHG	Greenhouse gas
gpd	Gallons per day
GPA	General Plan Amendment
gpm	Gallons per minute
GPU	General Plan Update
GWP	Global Warming Potential
HCM	Highway Capacity Manual
HFC	Hydro-fluorocarbon
HRG	City of San Diego, Historical Resources Guidelines
HSA	Hydrologic Subarea
HU	Hydrologic Unit
ICLEI	International Council for Local Environmental Initiatives
IMPs	Integrated Management Practices
IS	Initial Study
I-8	Interstate 8
I-15	Interstate 15
ISO	California Independent System Operator

List of Acronyms and Abbreviations

kWh	Kilowatt hours
lb/hr	Pounds per hour
LBP	Lead-based paint
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
L_{dn}	day/night average sound level
LDR	Land Development Review
LEA	Local Enforcement Agency
LEED	Leadership in Energy and Environmental Design
LEED ND	LEED Neighborhood Development
L_{eq}	Equivalent Continuous Sound Level
LID	Low Impact Development
LOS	Level of Service
Metro	City of San Diego Metropolitan Wastewater Department
mgd	Million gallons per day
MHPA	Multi-Habitat Planning Area
MHPOZ	Mobile Home Park Overlay Zone
MLD	Most likely descendent
MMC	Mitigation Monitoring Coordinator or Coordination Section
MMRP	Mitigation Monitoring and Reporting Program
mph	Miles per hour
MRP	Monitoring and Reporting Program
MSCP	Multiple Species Conservation Program
MSL	Mean Sea Level
MTDB	Metropolitan Transit Development Board
MTDD	Mission Trails Design District
MTDG	Mission Trails Design Guidelines
MTRP	Mission Trails Regional Park
MW	Megawatt
MWh	Megawatt hour
MWD	Metropolitan Water District
MWWd	Metropolitan Wastewater Department
MSR	Municipal Services Review
N/A	Not Applicable
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NAP	Not A Part
NB	Northbound
NCCP	National Habitat community Conservation Planning
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NOP	Notice of Preparation
NCP	Navajo Community Plan
N_2O	Nitrous oxide
NO_2	Nitrogen dioxide
NO_x	Oxides of nitrogen
NRHP	National Register of Historic Places
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
NWP	Nationwide Permit
ODS	Ozone Depleting Substances

List of Acronyms and Abbreviations

OHP	Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
O ₃	Ozone
%	Percent or percentage
PACM	Presumed asbestos containing material
PDP	Planned Development Permit
PFC	perflourocarbons
PFFP	Public Facilities Financing Plan
PI	Principal Investigator
PM ₁₀	Particulate matter sized 10 microns or less
PM _{2.5}	Fine particulate matter equal to or less than 2.5 microns in size
Ppcy	Pounds per cubic yard
ppm	Parts per million
QP	Qualified Person
RAQS	Regional Air Quality Standards
RCP	(SANDAG's) Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RE	Resident Engineer
REC	Recognized environmental condition
RIR	Relocation Impact Report
RM	"Residential—Multiple Unit" Zone
ROG	Reactive Organic Gas
RPO	Resource Protection Ordinance
RTP	Regional Transportation Plan
RWQCB	(California) Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB	Southbound
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCIC	South Coast Information Center
SCP	Sustainable Community Program
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas and Electric
SDMM	San Diego Museum of Man
SDP	Site Development Permit
SDRP	San Diego River Park
SDSU	San Diego State University
SDUSD	San Diego Unified School District
sf	square feet
SF ₆	Sulfur hexafluoride
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
SoCal Gas	Southern California Gas Company
SoX	Sulfur oxides
SUSMP	Model Standard Urban Storm Water Mitigation Plan
SWAT	Special Weapons and Tactics
SWPPP	Storm Water Pollution Prevention Plan

List of Acronyms and Abbreviations

SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TCM	Transportation Control Measures
TNM	Traffic Noise Model
UBC	Uniform Building Code
UNFCCC	United Nations Framework Convention on Climate Change
UNEP	United Nations Environment Program
URBEMIS	URBan EMISsions model
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
V/C	Volume to Capacity
VMT	Vehicle miles of travel
VOC	Volatile organic compound
VTM	Vesting Tentative Map
WB	Westbound
WMP	Waste Management Plan
WQTR	Water Quality Technical Report
WSA	Water Supply Assessment

S.0 Executive Summary

S.1 Project Synopsis

This summary provides a brief synopsis of: (1) the proposed Archstone – Mission Gorge project, (2) the results of the environmental analysis contained within this Environmental Impact Report (EIR), (3) the alternatives to the proposed plan that were considered, and (4) the major areas of controversy and issues to be resolved by decision-makers. This summary does not contain the extensive background and analysis found in the document. Therefore, the reader should review the entire document to fully understand the project and its environmental consequences.

S.1.1 Project Location and Setting

The 10.22-acre Archstone – Mission Gorge project site is located in the San Diego community called Navajo. It is approximately 1.25 miles east of the Interstate 15 (I-15) and Friars Road interchange. More specifically, it is located at 6850 Mission Gorge Road at the southwest corner of Mission Gorge Road/Old Cliffs Road intersection and is the location of the Mission Valley Village Mobile Home Park (Figure 2-2).

Mission Gorge Road fronts the eastern border of the project site. Mission Gorge Road provides primary local access to the project site and additionally serves as a regional northeast-southwest travel way through the Mission Gorge/east Mission Valley area and the communities of Navajo and Allied Gardens. The north and south edges of the project site are bordered by commercial and industrial and residential land uses, respectively, and are not separated by roads. Admiral Baker Golf Course and the San Diego River occur outside the west boundary of the project site. As the project site is located adjacent to the east bank of the San Diego River, its 100-year floodplain extends onto the western edge of the project site, covering approximately 2.26 acres of the 10.22-acre site.

The project site is currently occupied by a mobile home park that has been in existence for nearly 50 years. A conditional use permit (CUP) for the mobile home park use was originally issued by the City of San Diego in 1959 (CUP 2632). A 12-space addition was approved for the mobile home park through issuance of a second CUP in 1968 (CUP 181-PC). Named Mission Valley Village, the mobile home park currently provides a total of 119 mobile home spaces, an office building, recreation hall, pool, spa, and laundry facilities, as well as several automobile parking spaces adjacent to the laundry facilities.

S.1.2 Project Description

The following discretionary actions would be considered by the San Diego City Council and applicable responsible federal agencies.

San Diego City Council Actions

- Community Plan Amendment/ General Plan Amendment
- Rezone
- Site Development Permit
- Vesting Tentative Map
- Easement Abandonment

Federal Actions

- Federal Aviation Administration (FAA) Part 77 Determination

Development of the 10.22-acre Archstone – Mission Gorge project would include a gated 444-unit multi-family rental condominium complex of two-, three-, and four-story buildings (maximum height 73 feet as measured from existing grade) wrapped around a 5.5-level (maximum height 59 feet as measured from finished grade) 796-stall parking structure, six differently themed common courtyards, a common recreation area including a fitness facility and pool plaza, a north-south pedestrian/bicycle trail providing linkage to a regional trail system, private streets, and an 8,000-square-foot commercial leasing space with associated 13-stall surface parking lot.

Of the 444 proposed total rental condominium units. The Archstone – Mission Gorge project proposes to set aside a minimum of 20 percent of the total 444 units for affordable housing per agreement with the City's Housing Commission. This would amount to 10 percent of the total units rented exclusively to households with an income at or below 65 percent of the area median income (AMI) for rental units, as required in the City's Inclusionary Affordable Housing Regulations (Municipal Code Section 142.1300) and an additional 10 percent of units rented to moderate income households.

The project also includes the installation of on-site water, sewer, and drainage facilities necessary to serve the proposed new development, as well as off-site access and circulation improvements.

S.1.3 Project Objectives

The project applicant has proposed the Archstone – Mission Gorge project to provide additional and affordable housing stock to help the City and region meet its housing goals and in reflection of emerging trends in the city.

In accordance with CEQA Guidelines Section 15124, the following specific objectives for the Archstone – Mission Gorge project support the underlying purpose of the project, assist the lead agency in developing a reasonable range

this project EIR, and will ultimately aid decision-makers in preparing findings and overriding considerations, if necessary.

- Provide maximum density residential development that is in accordance with the overall objectives of the adopted Navajo Community Plan land use designation of Multi-family Residential and underlying Base Zone of RM-3-7, without the temporary mobile home park overlay.
- Provide affordable multi-family residential housing that exceeds the goals and objectives of the City of San Diego's Inclusionary Affordable Housing Regulations by providing on-site units.
- Help the City of San Diego address its shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley.
- Provide a project design that reflects the positive qualities of the adjacent San Diego River and associated Multi-Habitat Planning Area in a multi-family development.
- Implement the City of Villages strategy and smart growth principles through the provision of high-density residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services, and through development of a centralized community with on-site recreational amenities and links to off-site regional natural areas.
- Implement reasonable sustainable building practices.
- Integrate land use and design with the Grantville Redevelopment Project Area plans, through provision of pedestrian, bicycle, and vehicular connectivity, and through provision of compatible land use and architectural and landscape design.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table S-1, located at the end of this section, summarizes the results of the environmental analysis completed for the Proposed Project. Table S-1 also includes mitigation measures to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance. The mitigation measures listed in Table S-1 are also discussed within each relevant topical areas.

Standard environmental design measures are proposed during the grading and construction phase to reduce adverse environmental effects related to those activities.

Additional measures are proposed from a project design standpoint to reduce long-term adverse impacts for the issues of land use, traffic/circulation, air quality, public utilities, cultural, noise, and biological resources.

All of these environmental design measures in addition to further discussion of potential and anticipated environmental impacts are detailed in Chapters 3 and 4 and further discussed in Chapters 5, 7, 8, and 9.

S.3 Areas of Controversy

The Notice of Preparation (NOP) was distributed in February 2008 for a 30-day public review and comment period and a public scoping meeting was held in March 2008. Public comments were received on the NOP and comments from the scoping meeting reflect controversy related to several environmental issues. The NOP, comment letters, and comment forms are included in this EIR as Appendix A.

Controversy associated with the proposed Archstone - Mission Gorge project proposal primarily concerns the issues of traffic congestion and parking capacity; population and housing issues associated with the displacement of current tenants on the site; community character and increased population in the region; air quality; noise; public utilities and services; and biological resources associated with the San Diego River. All of these issues are analyzed in the EIR.

S.4 Issues to be Resolved by the Decision-Making Body

The issues to be resolved by the decision-making body (in this case the City of San Diego) are those of if and how to mitigate the direct significant effects created by the implementation of the proposed project. The City of San Diego would decide if the significant unmitigable traffic impacts can be reduced and if the significant impacts associated with the environmental issues of land use, traffic/circulation, air quality, public utilities, cultural, noise, and biological resources, have been fully mitigated below a level of significance. The City of San Diego should also decide if the project conforms to criteria land use regulations and policies, such as those in the General Plan and the Navajo Community Plan and if deviations from these regulations are justified and acceptable. Furthermore, it should decide whether the benefits of the project justify removing the site from the mobile park overlay zone. Lastly, the City should determine whether any alternative might meet the key objectives of the project while reducing its environmental impact.

S.5 Project Alternatives

In order to fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the State CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

The alternatives identified below are intended to further reduce or avoid significant environmental effects of the proposed project. The EIR addresses the No Project Alternative and Reduced Project Alternative. Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analysis. Alternatives to the proposed project are evaluated in full in Chapter 9 of this document.

S.5.1 No Project Alternative

The No Project Alternative for the proposed Archstone – Mission Gorge project would be two-tiered: (1) maintenance of the site as a mobile home park and (2) future redevelopment of the site with a maximum of 444 multi-family units consistent with underlying land use designation in the Navajo Community Plan (Multi-family residential, medium-high density) and underlying zone (RM-3-7). Maintenance of the site as a mobile home site would be equivalent to the existing environmental setting. In this case, however, preservation of the site as a mobile home park cannot be assured; thus, it is reasonable to assume that there may be a future proposal to develop the site consistent with the community plan and zoning.

The No Project/Retain Mobile Home Park Alternative would be consistent with the Navajo Community Plan in that it would retain the Mobile Home Park Overlay and would eliminate the need for amending the Navajo Community Plan to remove the Mobile Home Park Overlay. This alternative would fall short of a number of the project’s objectives. This includes the objective of providing affordable multi-family residential housing, the objective of addressing the City’s shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley would not be met and the objective of applying smart growth principles through the provision of high-density residential units in an urbanized location adjacent to public transportation, employment, and other public infrastructure and services. Furthermore, due to the fact that the site was developed for mobile home park use prior to many recent/current land use development requirements, existing daily operation of the mobile home park results

in potential impacts to biological resources, geology/soils, hydrology/water quality, and solid waste disposal that would be avoided through design or mitigation measures incorporated into the proposed project. For these reasons, the No Project/Retain Mobile Home Park Alternative would not be considered the Environmentally Superior Alternative.

The No Project/Redevelopment with Multi-family Residential Alternative is a "no project" (i.e., a scenario where the proposed project is not approved) alternative which would generally result in the same level of impacts as the proposed project. However, in regard to the objective of providing affordable housing, this alternative may meet the objective to a lesser extent. Unlike the proposed project, which commits 20 percent of proposed on-site units to be set aside for low/moderate income residents, current regulations require only 10 percent. Thus, the No Project/Redevelopment with Multi-family Residential Alternative would not be considered the Environmentally Superior Alternative.

S.5.2 Reduced Project Alternative

This alternative would reduce the number of units to a level that would avoid significant unmitigated impacts associated with the proposed project. Based on the traffic report, this would entail 200 multi-family units and a density of 19.5 du/acre, which would be below the density range associated with the land use designation and zoning.

The lower yield in residential units would necessitate a different design for the project and the lower number of units would not support the cost of constructing a parking garage. Therefore, the Reduced Project Alternative would be designed as a "garden" product, with two- and three-story residential units constructed in several buildings over the entire site.

While the proposed project would exceed the City's Inclusionary Housing Ordinance by providing a minimum of 20 percent affordable units on-site, the Reduced Project Alternative would be unable to accommodate these affordable units on-site. This alternative would reach compliance with the City's Inclusionary Housing Ordinance by providing 10 percent affordable units off-site or by paying a fee to waive this requirement.

This alternative would fall short of a number of the project's objectives including the provision of affordable multi-family residential housing that exceeds the goals and objectives of the City of San Diego's Inclusionary Affordable Housing Regulations; assisting the City of San Diego in addressing its shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley; and implementing smart growth principles through the provision of high-density residential units in an

already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services.

The Reduced Project Alternative would represent the elimination of the proposed deviations for building and retaining wall height. By design, this alternative would eliminate significant roadway impacts under near-term and horizon year condition, both with and without the Tierrasanta Blvd./Santo Road extensions. While other impacts would be similar to the proposed project, there would be a 55 percent reduction in the number of units and resulting in a reduction in impacts related to visual effects and community character, air quality, noise, public services, and utilities.

S.5.3 Environmentally Superior Alternative

Due to the elimination of the significant unmitigated traffic impact, the Reduced Project Alternative would be considered the environmentally superior alternative. However, considering San Diego's housing crisis and the decrease in affordable housing provided by this alternative, the attractiveness of the Reduced Project Alternative is much reduced compared to the current project proposal.

**TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LAND USE			
Would the proposed project conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?	<p>The proposed project could create short and long-term impacts to the adjacent MHPA from project construction and operation that would be potentially significant. To preclude such impacts, the proposed project would incorporate design features consistent with the City's MHPA Land Use Adjacency Guidelines. In order to assist City staff in determining that these impact-avoiding design features have been included in the project's final plans, verification by a qualified biologist would be required as stated in mitigation measure 4.1.5.3.</p>	<p>Prior to the issuance of any grading permits and/or the first pre-construction meeting, the owner/permittee shall submit evidence to the Assistant Deputy Director (ADD) of the Entitlements Division verifying that a qualified biologist has been retained to implement the biological resources mitigation program as detailed below:</p> <p>Prior to the first pre-construction meeting, the applicant shall provide a letter of verification to the ADD of the Entitlements Division stating that a qualified Biologist, as defined in the City of San Diego Biological Resource Guidelines (BRG), has been retained to implement the revegetation plan.</p> <p>At least thirty days prior to the pre-construction meeting, a second letter shall be submitted to the MMC section, which includes the name and contact information of the Biologist and the names of all persons involved in the Biological Monitoring of the project. At least thirty days prior to the pre-construction meeting, the qualified Biologist shall verify that any special reports, maps, plans and time lines, such as but not limited to, revegetation plans, plant relocation requirements and timing, avian or other wildlife protocol surveys, impact avoidance areas or other such information has been completed and updated.</p> <p>The qualified biologist (project biologist) shall attend the first pre-construction meeting.</p> <p>In addition the following mitigation measures related to the MHPA Land Use Adjacency Guidelines shall be implemented:</p> <ol style="list-style-type: none"> 1. Prior to initiation of any construction-related grading, the construction foreman shall discuss the sensitive nature of the adjacent habitat with the crew and subcontractor. 2. The limits of grading shall be clearly delineated by a survey crew prior to brushing, clearing or grading. The project biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved Exhibit A. The limits of grading shall be defined with silt fencing or orange construction fencing and checked by the biological monitor before initiation of construction grading. 3. No invasive non-native plant species shall be introduced into areas adjacent to the MHPA. Landscape plans shall not contain invasive, non-native species. 	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LAND USE (cont.)		<p>4. All lighting adjacent to the MHPA shall be shielded, unidirectional, low pressure sodium illumination (or similar) and directed away from preserve areas using <i>appropriate placement and shields</i>.</p> <p>5. All construction activities (including staging areas and/or storage areas) shall be restricted to the development area as shown on the approved Exhibit A. No equipment maintenance shall be conducted within or near the adjacent open space and/or sensitive areas and shall be restricted to the development area as shown on the approved Exhibit A. The project biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved Exhibit A.</p> <p>6. Natural drainage patterns shall be maintained as much as possible during construction. Erosion control techniques, including the use of sandbags, hay bales, and/or the installation of sediment traps, shall be used to control erosion and deter drainage during construction activities into the adjacent open space. Drainage from all development areas adjacent to the MHPA shall be directed away from the MHPA, or if not possible, must not drain directly into the MHPA, but instead into sedimentation basins, grassy swales, and/or mechanical trapping devices as specified by the City Engineer.</p> <p>7. No trash, oil, parking or other construction related activities shall be allowed outside the established limits of grading. All construction related debris shall be removed off-site to an approved disposal facility.</p> <p>8. Should construction occur during the breeding season of the coastal least Bell's vireo (March 1 and August 15), the following mitigation measures shall be required and implemented: Prior to the issuance of any grading permit, the Assistant Deputy Director's Environmental Designee shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans: No clearing, grubbing grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the Least Bell's Vireo, until the following requirements have been met to the satisfaction of the Assistant Deputy Director's (ADD) Environmental Designee (ED). A qualified biologist (possessing a valid endangered species act Section 10(a)(1)(A) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [db(A)] hourly average for the presence of the least Bell's vireo.</p>	

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LAND USE (cont.)	<p>Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife service within the breeding season prior to the commencement of construction. If the least Bell's vireo is present, then the following conditions must be met:</p> <p>Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 db(A) hourly average at the edge of occupied least Bell's vireo or habitat. An analysis showing that noise generated by construction activities would not exceed 60 db(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD ED at least two weeks prior to the commencement of construction activities.</p> <p>Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; <u>or</u></p> <p>At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 db(a) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 db(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LAND USE (cont.)		<p>Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the ADD ED, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.</p> <p>If least Bell's vireo are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ADD ED and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:</p> <p>If this evidence indicates the potential is high for least Bell's vireo to be present based on historical records or site conditions, then conditions shall be adhered as specified above.</p> <p>If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.</p>	

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION			
Would the proposed project result in a substantial impact upon existing or planned transportation systems? More specifically, would the proposed project result in an increase in project traffic which is substantial in relation to the existing traffic load and capacity of the street system, including the addition of a substantial amount of traffic to a congested freeway segment or interchange/ramp?	<p><i>Near Term (2010) Local Street System Intersection Operations.</i></p> <p>The increase in delay at the intersection of Mission Gorge Road/Greenbrier Avenue/Main Project Access is calculated to be greater than the significance threshold of one second for Level of Service (LOS) F (City's significance criteria) during the AM and PM peak hours. Therefore, the proposed project would result in significant impacts under the near-term condition at the following intersection: Mission Gorge Road/Greenbrier Avenue/Project access intersection.</p>	<p>At the intersection of Mission Gorge Road/Greenbrier Avenue/Project Access under near-term (2010) conditions:</p> <p>Prior to the issuance of building permits, the applicant shall provide the following improvements as described below and shown on Figure 4.2-12:</p> <p>Install a signal. Given the close proximity of this intersection to Mission Gorge Road/Old Cliffs Road, the new signal should be coordinated with the existing signal at Mission Gorge Road/Old Cliffs Road for improved traffic progression and operations.</p> <p>Provide a median break to facilitate full access to the project driveway at Mission Gorge Road (currently, there is a raised median along Mission Gorge Road in the vicinity of the project site).</p> <p>Provide a 250-foot left-turn pocket along the eastbound Mission Gorge Road approach for the inbound project traffic to turn left into the project driveway from eastbound Mission Gorge Road approach.</p> <p>Provide one inbound and one outbound lane along the project driveway with a throat length of 200 feet to sufficiently accommodate queues during the peak hours. An exclusive left-turn lane and a shared through/right-turn lane should be provided for the southbound project driveway approach at the intersection of Mission Gorge Road/Main Project Access.</p>	<p>Cumulative roadway and arterial segment impacts in the near-term and horizon (2030), both without and with Tierrasanta Boulevard and Santo Road Extensions conditions, are considered significant and unmitigable as improvement measures may be infeasible due the presence of various right-of-way and other physical constraints.</p>

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION (cont.)			
	<p><i>Near Term (2010) Local Street System Roadway Operations.</i> Since the project development would result in an increase in V/C ratio that is calculated to be greater than the significance threshold of 0.01 for LOS F (City's significance criteria) under near-term conditions, significant impacts are calculated at the following six roadway segments: Friars Road between Rancho Mission Road and I-15 NB Ramps, Friars Road between I-15 NB Ramps and I-15 SB Ramps, , Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, and Mission Gorge Road between Mission Gorge Place and Fairmount Avenue and Mission Gorge Road between Fairmount Avenue and I-8 WB Ramps.</p>	<p>To mitigate near-term impacts, widening Friars Road between Ranch Mission Road and I-15 SB Ramps to have four lanes in each direction (currently, three lanes in each direction) and widening Mission Gorge Road between Friars Road and I-8 WB Ramps to have three lanes in each direction (currently, two lanes in each direction) are expected to provide additional capacity and reduce the impacts to less than significant level under near- term conditions. However, these mitigation measures may be infeasible due to the presence of various right-of-way and other physical constraints in the vicinity of I-15/Friars Road and interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. Therefore, the near- term (direct) roadway impacts are considered significant and unmitigable.</p> <p>Partial mitigation would be obtained by the following conditions of approval:</p> <ul style="list-style-type: none"> • The applicant shall make a contribution towards the improvements of the seven roadway segments that are not built to ultimate classification. These roadway segments are Friars Road between Rancho Mission Road and I-15 NB ramps, Friars Road between I-15 NB Ramps and I-15 SB Ramps, Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Rainier Avenue and Vandever Avenue, Mission Gorge Road between Vandever Avenue and Twain Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, and Mission Gorge Road between Mission Gorge Place and Fairmount Avenue. The project contribution percentage towards the improvements of the aforementioned seven roadway segments is calculated to be 5.5 percent as detailed in the Traffic Report, Appendix D. • The applicant shall provide and maintain a private shuttle connecting the project to the trolley station and nearby retail services. Consequently, the City and the project applicant shall coordinate to provide this ridesharing service, which should be satisfactory to both parties. The ridesharing service will be limited to the peak hours from 6 A.M. through 10 A.M. in the morning and 3 PM through 7 PM in the evening. 	

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION (cont.)			
	<p><i>Horizon (2030) without Tierrasanta Boulevard and Santo Road Extensions Intersection Operations.</i> The increase in delay at the intersection of Mission Gorge Road/Greenbrier Avenue/Main Project Access is calculated to be greater than the significance threshold of 1 second for LOS F (City's significance criteria) during the AM and PM peak hours. Thus, the proposed project would result in significant impacts under the horizon (2030) without Tierrasanta Boulevard and Santo Road Extensions Condition at Mission Gorge Road/Greenbrier Avenue/Main Project Access intersection.</p>	<p>The mitigation measures required at the intersection of Mission Gorge Road/Greenbrier Avenue/Main Project Access under horizon (2030) conditions will be the same as those of near-term.</p>	
	<p><i>Horizon (2030) without Tierrasanta Boulevard and Santo Road Extensions Roadway Arterial Segments and Operations.</i> Based on the City's significance criteria, the project is calculated to have a significant impact at the following 13 roadway segments under the horizon (2030) without Tierrasanta Boulevard and Santo Road Extensions Condition:</p>	<p>To mitigate horizon (2030) impacts, widening Friars Road between Ranch Mission Road and I-15 SB Ramps to have four lanes in each direction (currently, three lanes in each direction) and widening Mission Gorge Road between Friars Road and I-8 WB Ramps to have three lanes in each direction (currently, two lanes in each direction) are expected to provide additional capacity and reduce the impacts to less than significant level under horizon-year (2030) conditions. However, these mitigation measures may be infeasible due to the presence of various right-of-way and other physical constraints in the vicinity of I-15/Friars Road and interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. Therefore, the aforementioned cumulative roadway/arterial segments impacts without Tierrasanta Boulevard and Santo Road extensions are considered significant and unmitigable.</p>	

000107

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION (cont.)			
	Mission Gorge Road between Greenbrier Avenue and Zion Avenue	<p>Partial mitigation would be obtained by the following conditions of approval:</p> <ul style="list-style-type: none"> The applicant shall make a contribution towards the improvements of the seven roadway segments that are not built to ultimate classification. These roadway segments are Friars Road between Rancho Mission Road and I-15 NB ramps, Friars Road between I-15 NB Ramps and I-15 SB Ramps, Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Rainier Avenue and Vandever Avenue, Mission Gorge Road between Vandever Avenue and Twain Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, and Mission Gorge Road between Mission Gorge Place and Fairmount Avenue. The project contribution percentage towards the improvements of the aforementioned seven roadway segments is calculated to be 5.5 percent as detailed in the Traffic Report, Appendix D. The applicant shall provide and maintain a private shuttle connecting the project to the trolley station and nearby retail services. Consequently, the City and the project applicant shall coordinate to provide this ridesharing service, which should be satisfactory to both parties. The ridesharing service will be limited to the peak hours from 6 A.M. through 10 A.M. in the morning and 3 PM through 7 PM in the evening. 	
	Mission Gorge Road between Zion Avenue and Friars Road		
	Friars Road between Mission Gorge Road and Riverdale Street		
	Friars Road between Riverdale Street and Santo Road		
	Friars Road between Santo Road and Rancho Mission Road		
	Friars Road between Rancho Mission Road and I-15 NB Ramps		
	Friars Road between I-15 NB Ramps and I-15 SB Ramps		
	Mission Gorge Road between Friars Road and Rainier Avenue		
	Mission Gorge Road between Rainier Avenue and Vandever Avenue		
	Mission Gorge Road between Vandever Avenue and Twain Avenue		
	Mission Gorge Road between Twain Avenue and Mission Gorge Place		
	Mission Gorge Road between Mission Gorge Place and Fairmount Avenue		
	Mission Gorge Road between Fairmount Avenue and I-8 WB Ramps		

000107

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION (cont.)	<p>Since the decrease in speeds is calculated to be greater than the significant thresholds of 1 mile per hour for LOS E and 0.5 mile per hour for LOS F with the addition of project traffic, the proposed project is calculated to have a significant impact under Horizon (2030) Conditions without Tierrasanta Boulevard and Santo Road extensions at the following two arterial segments:</p> <p><i>Horizon (2030) with Tierrasanta Boulevard and Santo Road Extensions Intersection Operations.</i> The increase in delay at the intersection of Mission Gorge Road/Greenbrier Avenue/Main Project Access is calculated to be greater than the significance threshold of 1 second for LOS F (City's significance criteria) during the AM and PM peak hours. Therefore, the proposed project would result in significant impacts under the Horizon (2030) with Tierrasanta Boulevard and Santo Road Extensions Condition:</p> <p>Mission Gorge Road/Greenbrier Avenue/Main Project Access intersection</p>	<p>The mitigation measures required at the intersection of Mission Gorge Road/Greenbrier Avenue/Main Project Access under horizon (2030) conditions will be the same as those of near-term.</p>	

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION (cont.)			
	<p><i>Horizon (2030) with Tierrasanta Boulevard and Santo Road Extensions Roadway and Arterial Segments Operations.</i> Based on City's significance criteria, the project is calculated to have a significant impact at the following 12 roadway segments under the Horizon (2030) with Tierrasanta Boulevard and Santo Road Extensions Condition:</p> <p>Mission Gorge Road between Greenbrier Avenue and Zion Avenue</p> <p>Mission Gorge Road between Zion Avenue and Friars Road</p> <p>Friars Road between Mission Gorge Road and Riverdale Street</p> <p>Friars Road between Riverdale Street and Santo Road</p> <p>Friars Road between Santo Road and Rancho Mission Road</p> <p>Friars Road between Rancho Mission Road and I-15 NB Ramps</p> <p>Mission Gorge Road between Friars Road and Rainier Avenue</p> <p>Mission Gorge Road between Rainier Avenue and Vandever Avenue</p> <p>Mission Gorge Road between Vandever Avenue and Twain Avenue</p>	<p>To mitigate horizon (2030) impacts, widening Friars Road between Ranch Mission Road and I-15 SB Ramps to have four lanes in each direction (currently, three lanes in each direction) and widening Mission Gorge Road between Friars Road and I-8 WB Ramps to have three lanes in each direction (currently, two lanes in each direction) are expected to provide additional capacity and reduce the impacts to less than significant level under horizon-year (2030) conditions. However, these mitigation measures may be infeasible due to the presence of various right-of-way and other physical constraints in the vicinity of I-15/Friars Road and interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. Therefore, the aforementioned cumulative roadway/arterial segments impacts with Tierrasanta Boulevard and Santo Road extensions are considered significant and unmitigable.</p> <p>Partial mitigation would be obtained by the following conditions of approval:</p> <ul style="list-style-type: none"> The applicant shall make a contribution towards the improvements of the seven roadway segments that are not built to ultimate classification. These roadway segments are Friars Road between Rancho Mission Road and I-15 NB ramps, Friars Road between I-15 NB Ramps and I-15 SB Ramps, Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Rainier Avenue and Vandever Avenue, Mission Gorge Road between Vandever Avenue and Twain Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, Mission Gorge Road between Friars Road and Rainier Avenue, Mission Gorge Road between Twain Avenue and Mission Gorge Place, and Mission Gorge Road between Mission Gorge Place and Fairmount Avenue. The project contribution percentage towards the improvements of the aforementioned seven roadway segments is calculated to be 5.5 percent as detailed in the Traffic Report, Appendix D. The applicant shall provide and maintain a private shuttle connecting the project to the trolley station and nearby retail services. Consequently, the City and the project applicant shall coordinate to provide this ridesharing service, which should be satisfactory to both parties. The ridesharing service will be limited to the peak hours from 6 A.M. through 10 A.M. in the morning and 3 PM through 7 PM in the evening. 	

000110

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC CIRCULATION (cont.)			
	Mission Gorge Road between Twain Avenue and Mission Gorge Place		
	Mission Gorge Road between Mission Gorge Place and Fairmount Avenue		
	Mission Gorge Road between Fairmount Avenue and I-8 WB Ramps		
	Since the decrease in speeds is calculated to be greater than the significant thresholds of 1 mile per hour for LOS E and 0.5 mile per hour for LOS F with the addition of project traffic, the proposed project is calculated to have a significant impact under horizon (2030) conditions with Tierrasanta Boulevard and Santo Road extensions at the following arterial segment:		
	Mission Gorge Road between Zion Avenue and Friars Road		

000110

000111

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
AIR QUALITY			
Would the proposed project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<i>Air Quality Violation.</i> Maximum daily construction emissions are projected to be less than the applicable thresholds for all criteria pollutants except for ROG. Impacts related to ROG emission would be significant unless an exterior paint with a VOC content no greater than 90 grams per liter is used. Impacts are significant without mitigation. It is assumed interior architectural coatings would have a state-mandated VOC content of 50 grams per liter.	Prior to issuance of grading or building permits by the City of San Diego, the project applicant shall implement and record on final grading and construction plans the condition that the VOC content of the exterior architectural coating shall have a VOC content no greater than 90 grams per liter. Impacts related to ROG emission would be reduced to a level below significance by using an exterior architectural coating with a VOC content no greater than 90 grams per liter.	Less than Significant

000111

000112

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC UTILITIES			
Would the proposed project result in a need for new or substantial alteration of solid waste disposal systems that would create physical impacts?	<p><i>Solid Waste.</i> The proposed project would generate large amounts of solid waste through demolition, construction, and operation. However, the proposed project would comply with state and City requirements to reduce solid waste generation by 50 percent through implementation of a WMP and adherence to the City's Municipal Code. Implementation of the project WMP would need to be ensured and verified in order that project impacts would be considered less than significant. Therefore, solid waste impacts are concluded to be potentially significant until mitigation requiring WMP coordination and verification is implemented as stated in mitigation measure 4.4.5.3.</p>	<p>Prior to issuance of any construction permit, including but is not limited to, demolition, grading, building or any other construction permit, the Assistant Deputy Director (ADD) Environmental Designee shall verify that the all the requirements of the Refuse & Recyclable Materials Storage Regulations and all of the requirements of the waste management plan are shown and noted on the appropriate construction documents. All requirements, notes and graphics shall be in substantial conformance with the conditions and exhibits of the associated discretionary approval.</p> <p>The construction documents shall include a waste management plan that addresses the following information and elements for demolition, construction, and occupancy phases of the project as applicable: tons of waste anticipated to be generated, material type of waste to be generated, source separation techniques for waste generated, how materials will be reused on site, name and location of recycling, reuse, or landfill facilities where waste will be taken if not reused on site, a "buy recycled" program, how the project will aim to reduce the generation of construction/ demolition debris, a plan of how waste reduction and recycling goals will be communicated to subcontractors, a time line for each of the three main phases of the project as stated above, a list of required progress and final inspections by City staff.</p> <p>The plan shall strive for a goal of 50 percent waste reduction.</p> <p>The plan shall include specific performance measures to be assessed upon the completion of the project to measure success in achieving waste minimization goals.</p> <p>The Plan shall include notes requiring the Permittee to notify Mitigation, Monitoring, and Coordination (MMC) and Environmental Services Department (ESD) when: a demolition permit is issued, demolition begins on site, inspections are needed. The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during demolition and construction to inspect the progress of the project's waste diversion efforts.</p>	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC UTILITIES (cont.)	<p>The Plan shall include notes requiring the Permittee to notify Mitigation, Monitoring, and Coordination (MMC) and Environmental Services Department (ESD) when: a demolition permit is issued, demolition begins on site, inspections are needed. The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during demolition and construction to inspect the progress of the project's waste diversion efforts.</p> <p>Prior to issuance of any construction permit, including but is not limited to, demolition, grading, building or any other construction permit, the permittee shall be responsible to obtain written verification from MMC indicating that the permittee has arranged a preconstruction meeting to coordinate the implementation of the Mitigation, Monitoring, and Reporting Program (MMRP).</p> <p>The Precon Meeting that shall include: the Construction Manager, Demolition/Building/Grading Contractor; MMC, ESD and the Building Inspector (BI) and/or the Resident Engineer (RE) (whichever is applicable) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by MMC and ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance. At the Precon Meeting, the Permittee shall submit Three (3) reduced copies (11"x 17") of the approved waste management plan to MMC (2) and ESD (1).</p> <p>Prior to the Start of Demolition/Construction, the Permittee/ Construction Manager shall submit a construction/demolition schedule to MMC and ESD.</p> <p>The Permittee/ Construction Manager shall call for inspections by the RE/BI and both MMC and ESD, who will periodically visit the demolition/construction site to verify implementation of the waste management plan. The Consultant Site Visit Record (CSV) shall be used to document the Daily Waste Management Activity/progress.</p> <p>Within 30 days after the completion of the implementation of the MMRP, for any demolition or construction permit, a final results report shall be submitted to both MMC and ESD for review and approval to the satisfaction of the City. MMC will coordinate the approval with ESD and issue the approval notification.</p> <p>The permittee shall provide documentation to the ADD Environmental Designee, that the waste management plan has been effectively implemented.</p>		

000114

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC UTILITIES (cont.)			
		The permittee shall submit written evidence to the ADD Environmental Designee that the final Demolition/Construction report has been approved by MMC and ESD. This report shall summarize the results of implementing the above Waste Management Plan elements, including: the actual waste generated and diverted from the project, the waste reduction percentage achieved, and how that goal was achieved, etc.	
CULTURAL/HISTORICAL RESOURCES			
Would the proposed project result in the alteration and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?	<i>Prehistoric/Historic Resources.</i> Due to the location of the project site within the San Diego River valley where known prehistoric and historic resources exist, there is a potential for subsurface cultural resources to exist in the western portion of the project site which is within the floodplain of the San Diego River. Sensitive cultural resources could be uncovered during project grading, resulting in a significant loss of cultural resources. Given the location of the project site in an area rich in cultural resources, the potential loss of subsurface cultural resources would be a significant impact.	<p>The area of monitoring shall extend from the western boundary of the project site 300 feet to the east at the southern edge and widen to 600 feet at the northern edge. The eastern edge of the proposed monitoring area corresponds to the current obvious elevation change.</p> <p>Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental Designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the appropriate construction documents</p> <p>The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</p> <p>MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.</p> <p><i>Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program.</i></p> <p>The PI shall provide verification to MMC that a site specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</p> <p>The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</p>	Less than Significant

000115

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL/HISTORICAL RESOURCES (cont.)	<p>The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.</p> <p>Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</p> <p>The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.</p> <p>The Archaeological Monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.</p>		

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TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL/HISTORICAL RESOURCES (cont.)	<p>The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRS shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</p> <p>The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.</p> <p>In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.</p> <p>The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</p> <p>The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.</p> <p>The PI and Native American monitor shall evaluate the significance of the resource. If Human Remains are involved, follow protocol outlined below.</p> <p>The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.</p> <p>If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.</p> <p>If resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL/HISTORICAL RESOURCES (cont.)	<p>If human remains are discovered, work shall halt in that area and the following procedures as set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p> <p>Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS).</p> <p>The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.</p> <p>Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.</p> <p>The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.</p> <p>If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.</p> <p>If human remains ARE determined to be Native American, the Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.</p> <p>NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.</p> <p>The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with the California Public Resource and Health & Safety Codes.</p> <p>The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL/HISTORICAL RESOURCES (cont.)	<p>Disposition of Native American Human Remains shall be determined between the MLD and the PI, if: the NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; or; the landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.</p> <p>In order to protect these sites, the Landowner shall do one or more of the following: (1) record the site with the NAHC; (2) record an open space or conservation easement on the site; (3) record a document with the County.</p> <p>Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to the protocols discussed above.</p> <p>If Human Remains are NOT Native American, the PI shall contact the Medical Examiner and notify them of the historic era context of the burial. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).</p> <p>If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for interment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the Museum of Man.</p> <p>When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Precon meeting. In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL/HISTORICAL RESOURCES (cont.)	<p>In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVr and submit to MMC via fax by 8AM of the next business day.</p> <p>All night and/or weekend discoveries shall be processed and documented using the existing procedures detailed in above for during construction and discovery of human remains.</p> <p>If the PI determines that a potentially significant discovery has been made, the procedures detailed above for normal work hours shall be followed.</p> <p>The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings, unless other specific arrangements have been made.</p> <p>If night and/or weekend work becomes necessary during the course of construction, the Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. The RE, or BI, as appropriate, shall notify MMC immediately. All other procedures described above shall apply, as appropriate.</p> <p>The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.</p> <p>For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.</p> <p>The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> <p>MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL/HISTORICAL RESOURCES (cont.)			
	<p>The PI shall submit revised Draft Monitoring Report to MMC for approval.</p> <p>MMC shall provide written verification to the PI of the approved report.</p> <p>MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</p> <p>The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.</p> <p>The PI shall be responsible for ensuring that all artifacts are analyzed to identify <i>function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.</i></p> <p>The cost for curation is the responsibility of the property owner.</p> <p>The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.</p> <p>The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.</p> <p>The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.</p> <p>The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
NOISE			
Would the proposed project expose people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan?	<p><i>Interior Noise.</i> Since interior noise levels could exceed 45 dB(A) CNEL for the buildings on the eastern half of the project site, impacts would be considered significant without mitigation. Mitigation would be required to ensure that interior noise levels in this location would not exceed 45 dB(A) CNEL.</p>	<p>Prior to the issuance of building permits for the units at the eastern half of the project site, the applicant shall submit a detailed acoustical analysis to document that interior noise levels would be below the 45 dB(A) CNEL standard. The analysis shall consider all habitable rooms of the affected units.</p> <p>Where exterior noise levels are projected to exceed 60 dB(A) CNEL for residential units on the eastern half of the project site (Figure 4.6-4), windows would need to be closed in order to achieve the necessary exterior to interior noise reduction [45 dB(A) CNEL]. Consequently, the design for these affected units will include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed. With the use of windows and doors with extra insulation, interior noise levels can be reduced to meet the noise standards.</p>	Less than Significant
BIOLOGICAL RESOURCES			
Would the proposed project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFG or USFWS?	<p><i>Sensitive Species.</i> While no sensitive wildlife species were detected within the project boundaries, the least Bell's vireo and Cooper's hawk (raptor) are both sensitive wildlife species that could potentially occur on or adjacent to the project site. Because construction activities could be disruptive to these birds, project impacts would be significant.</p>	<p>In order to avoid or reduce potential indirect and construction impacts to the least Bell's vireo, the applicant shall implement the following mitigation measure:</p> <p>Prior to the issuance of any grading permit, the Assistant Deputy Director's Environmental Designee shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:</p> <p>No clearing, grubbing grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the Least Bell's Vireo, until the following requirements have been met to the satisfaction of the Assistant Deputy Director's (ADD) Environmental Designee (ED).</p> <p>A qualified biologist (possessing a valid endangered species act Section 10(a)(1)(A) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [db(A)] hourly average for the presence of the least Bell's vireo.</p> <p>Surveys for the this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife service within the breeding season prior to the commencement of construction. If the least Bell's vireo is present, then the following conditions must be met:</p> <p>Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist;</p>	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
BIOLOGICAL RESOURCES (cont.)		<p>and between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 db(A) hourly average at the edge of occupied least Bell's vireo or habitat. An analysis showing that noise generated by construction activities would not exceed 60 db(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD ED at least two weeks prior to the commencement of construction activities.</p> <p>Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; <u>or</u></p> <p>At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 db(a) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 db(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).</p> <p>Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the ADD ED, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average.</p> <p>Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.</p>	

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
BIOLOGICAL RESOURCES (cont.)	<p>If least Bell's vireo are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ADD ED and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:</p> <p>If this evidence indicates the potential is high for least Bell's vireo to be present based on historical records or site conditions, then conditions shall be adhered as specified above.</p> <p>If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.</p> <p>In order to avoid or reduce potential indirect and construction impacts to nesting raptors, the applicant shall implement the following mitigation measure:</p> <p>Prior to the issuance of any grading permit, the Assistant Deputy Director's (ADD) Environmental Designee (ED) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:</p> <p>No clearing, grubbing grading, or other construction activities shall occur between February 1 and September 15, the Raptor breeding season, until the following requirements have been met to the satisfaction of the Assistant Deputy Director's (ADD) Environmental Designee (ED):</p> <p>If project grading is proposed during the raptor breeding season (February 1-September 15), the project biologist shall conduct a pre-grading survey for active raptor nests in within 300 feet of the development area and submit a letter report to Mitigation, Monitoring, and Coordination (MMC) prior to the preconstruction meeting.</p> <p>If active raptor nests are detected, the report shall include mitigation in conformance with the City's Biology Guidelines (i.e. appropriate buffers, monitoring schedules, etc.) to the satisfaction of the Assistant Deputy Director (ADD) Environmental Designee. Mitigation requirements determined by the project biologist and the ADD Environmental Designee shall be incorporated into the project's Biological Construction Monitoring Exhibit (BCME) and monitoring results incorporated in to the final biological construction monitoring report.</p> <p>If no nesting raptors are detected during the pre-grading survey, no mitigation is required.</p>		

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
BIOLOGICAL RESOURCES (cont.)			
Would the proposed project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?	<i>Sensitive Habitat/MHPA Edge Effects.</i> The proposed project poses potential short term and long term impacts to the adjacent MHPA/sensitive habitat. Short-term construction impacts could result in disruption of nesting and breeding and could thus affect the population of sensitive species. Long-term impacts would be associated with drainage, toxins/water quality, lighting, noise, barriers, invasives, brush management and land development. To preclude such impacts, the project shall incorporate design features consistent with the City's MSCP - MHPA Land Use Adjacency Guidelines.	The Mitigation Measure 4.1.5.3 for Land Use stated below specifies mitigation for impacts addressing MHPA adjacency and edge effects.	Less than Significant

1.0 Introduction

This Environmental Impact Report (EIR) for the proposed Archstone – Mission Gorge project has been prepared by the City of San Diego in compliance with the California Environmental Quality Act (CEQA) and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000, et seq.), and in accordance with the City of San Diego's Environmental Impact Report Guidelines (City of San Diego, December 2005) and Significance Determination Thresholds (City of San Diego, January 2007).

The proposed Archstone – Mission Gorge project entails the discontinuation of an existing 119-space mobile home park and the construction of a 444-unit multi-family rental condominium complex of two-, three-, and four-story buildings wrapped around a 5.5-level parking structure, with a pool plaza, fitness facility, and open space pedestrian and bicycle trail on a 10.22-acre site. A minimum of 20 percent of the total number of rental condominium units would be set aside as affordable housing through an agreement with the San Diego Housing Commission.

Discretionary actions required to implement the project include: amendments to the Navajo Community Plan (NCP) and City General Plan to remove the project site from the Mobile Home Park Overlay Zone (but retain the project site within the existing underlying Multi-family Residential land use designation); a rezone to remove the Mobile Home Park Overlay Zone from the project site (but retain the existing underlying RM-3-7 Base Zone); a Site Development Permit (SDP); an Easement Abandonment for an existing gas and electric easement; and a Vesting Tentative Map to allow the rental condominium development. An Inclusionary Housing Agreement with the City's Housing Commission would also need to be obtained.

The SDP is required to comply with City procedures to discontinue the existing on-site mobile home park and convert the project site to other uses (in accordance with Municipal Code, Article 3, Division 6: Mobilehome Park Discontinuance and Tenant Relocation Regulations, Sections 143.0610 - 143.0640.) The SDP is also required to allow deviations from the building height, side yard setback, retaining wall height, vehicular use area planting, and floor area ratio requirements of the development regulations of the Base Zone RM-3-7 (in accordance with Municipal Code, Article 1, Division 4: Residential Base Zones, Section 131.0466, Deviations from Development Regulations); to allow development within the Community Plan Implementation Overlay Zone Type B area (in accordance with Municipal Code, Article 2, Division 14: Community Plan Implementation Overlay Zone, Sections 132.1401-132.1403.); and to allow subdivision of premises containing environmentally sensitive lands as identified in the Environmentally Sensitive Lands Ordinance, in accordance with Municipal Code, Article 3: Supplemental Development Regulations, Division 1: Environmentally Sensitive

Lands Regulations, Section 143.0110). A detailed project description and discussion of required discretionary actions is contained in Section 3.0, Project Description.

1.1 EIR Purpose and Intended Uses

1.1.1 EIR Purpose

The purpose of this EIR is to:

- Inform decision-makers and the general public of the potential environmental consequences that may result from the approval and implementation of the proposed project; and to
- Identify mitigation measures or project alternatives that are available to avoid or reduce potential significant environmental impacts.

1.1.2 Intended Uses of the EIR

This EIR is informational in nature and is intended for use by City of San Diego decision-makers; other responsible, trustee, or interested agencies; and the general public, in evaluating the potential environmental effects, mitigation measures, and alternatives of the proposed Archstone – Mission Gorge project.

This EIR provides decision-makers, public agencies, and the public with detailed information about the potential significant adverse environmental impacts of the proposed project. By recognizing the environmental impacts of the proposed project, decision-makers will have a better understanding of the physical and environmental changes that would accompany the approval of the project. The EIR includes recommended mitigation measures which, when implemented, would lessen project impacts and provide the Lead Agency with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the proposed project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the project.

1.2 EIR Legal Authority

1.2.1 Lead Agency

The City of San Diego is the Lead Agency for the proposed Archstone – Mission Gorge project as identified pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the

public agency which has the principal responsibility and authority for carrying out or approving the Archstone – Mission Gorge project. As Lead Agency, the City of San Diego Development Services Department, Environmental Analysis Section (EAS) conducted a preliminary review of the proposed development and decided that an EIR was required, and has thus caused this document to be prepared.

The analysis and findings in this document reflect the independent, impartial conclusions of the City of San Diego.

1.2.2 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by responsible and trustee agencies. A Responsible Agency, defined pursuant to State CEQA Guidelines Section 15381, includes all public agencies other than the Lead Agency which have discretionary approval power over the proposed project. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California.

Implementation of the proposed Archstone – Mission Gorge project would require consultation from the following trustee agency, as described below.

Federal Aviation Administration (FAA): Because the project site lies within the FAA Noticing Area for Montgomery Field, the project has been reviewed against federal obstruction evaluation criteria contained in the Federal Code of Regulations, Title 14, FAA Part 77 (Obstruction Evaluation/Airport Airspace Analysis) and an FAA Determination of No Hazard to Air Navigation has been submitted for the proposed project.

1.3 EIR Review Process

The City of San Diego, as Lead Agency, is responsible for the preparation and review of this EIR. The EIR review process occurs in two basic stages. The first stage is the Draft EIR, which offers the public the opportunity to comment on the document, while the second stage is the Final EIR, which provides the basis for approving the proposed project.

1.3.1 Draft EIR

The Draft EIR is distributed for review to the public and interested and affected agencies for a review period for the purpose of providing comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and

ways in which the significant effects of the project might be avoided and mitigated" (Section 15204, CEQA Guidelines). In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft EIR a Notice of Completion is filed with the State Office of Planning and Research and notice of availability of the Draft EIR issued in a newspaper of general circulation in the area.

1.3.1.1 Availability and Review of the Draft EIR

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego, Development Services Department, Entitlements Division, located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

San Diego Public Library
Central Library
820 E Street
San Diego, CA 92101

Benjamin
Branch Library
5188 Zion Avenue
San Diego, CA 92120

1.3.2 Final EIR

The City, as Lead Agency, will provide written responses to comments received on the Draft EIR per CEQA Guidelines Section 15088 and will consider all comments in making its decision to certify the Final EIR. Specifically, comments addressing the scope and adequacy of the environmental analysis have been solicited. Detailed responses to the comments received during public review; a Mitigation Monitoring and Reporting Program (MMRP); *Findings of Fact*; and a *Statement of Overriding Considerations for impacts* identified in the Draft EIR as significant and unmitigable will be prepared and compiled as part of the EIR finalization process. Only cumulative impacts associated with traffic would remain significant and unavoidable after project mitigation. All significant direct project impacts can be reduced to below a level of significance through implementation of the recommended mitigation measures. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final EIR as being complete and in accordance with CEQA. The Final EIR will be available for public review at least 14 days before the public hearing in order to provide commentors the opportunity to review the written responses to their comment letters.

1.4 EIR Scope and Content

1.4.1 EIR Scope

The scope of analysis for this EIR was determined by the City of San Diego as a result of initial project review and consideration of comments received in response to the Notice of Preparation (NOP) circulated February 25, 2008 and a scoping meeting held on March 18, 2008 at the Mission Valley Church of the Nazarene. The City's NOP, associated responses, and comments made during the scoping meeting are included in Appendix A of this EIR.

Through these scoping activities, the proposed Archstone – Mission Gorge project was determined to have the potential to result in the following significant environmental impacts:

- Air Quality
- Biological Resources
- Cultural/Historical Resources
- Geology and Soils
- Global Warming
- Hydrology
- Land Use
- Noise
- Population and Housing
- Public Health and Safety
- Public Services
- Public Utilities
- Traffic/Circulation/Parking
- Visual effects and Neighborhood Character
- Water Quality

1.4.2 Type of EIR

This EIR has been prepared as a Project EIR, as defined in Section 15161 of the CEQA Guidelines. In accordance with CEQA, this Project EIR examines the environmental impacts of a specific development project, the proposed Archstone - Mission Gorge project, and focuses primarily on the physical changes in the environment that would result from the project, including all project phases of planning, construction, and operation.

1.4.3 EIR Content

The intent of this EIR is to determine whether implementation of the Archstone – Mission Gorge project would have a significant effect on the environment, through analysis of the issues identified during the scoping process (see Section 1.4.1 above). Under each issue area, Section 4.0, Environmental Analysis, of this EIR includes a description of the existing conditions relevant to each environmental topic; presentation of threshold(s) of

significance, based on the City of San Diego Development Services Department's CEQA Significance Determination Thresholds, for the particular issue area under evaluation; identification of an issue statement; an assessment of any impacts associated with implementation of the project; a summary of the significance of any project impacts; and recommendations for mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area. Pursuant to CEQA Guidelines Section 15126, all phases of the proposed project are considered in this EIR when evaluating its potential impacts on the environment, including the planning, acquisition, development, and operation phases. Impacts are identified as direct or indirect, short-term or long-term and assessed on a "plan to ground" basis. The "plan to ground" analysis addresses the changes or impacts that would result from implementation of the proposed project compared to existing ground conditions.

Cumulative impacts are presented under a separate discussion section (Section 7.0) based on issues which were found to be potentially cumulatively significant. A section titled Effects Found Not to Be Significant (Section 8.0) presents a brief discussion of the environmental effects of the project which were evaluated as part of the initial scoping and review process and were found not to be potentially significant. The EIR also includes mandatory CEQA discussion areas (Sections 5.0 and 6.0), which present a discussion of Significant Irreversible Environmental Changes and Growth Inducement, respectively, as well as a discussion of Project Alternatives (Section 9.0) which could avoid or reduce potentially significant environmental impacts associated with implementation of the project.

For significant cumulative impacts associated with traffic that cannot be ensured to be mitigated to below a level of significance, the EIR states that project approval would require that the decision-maker adopt Findings and a Statement of Overriding Considerations in accordance with Sections 15091 and 15093 of the CEQA Guidelines.

1.4.4 EIR Format

1.4.4.1 Organization

The format and order of contents of this EIR follow the direction of the City's Environmental Impact Report Guidelines (December 2005). A brief overview of the various sections of this EIR is provided below:

- **Executive Summary.** Provides a summary of the EIR, a brief description of the *proposed project*, *identification of areas of controversy*, and *inclusion of a summary table* identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. A summary of the analyzed project alternatives and comparison of the potential impacts of the alternatives with those of the proposed project is also provided.

- **Section 1.0 Introduction.** Contains an overview of the legal authority, purpose and intended uses of the project EIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.
- **Section 2.0 Environmental Setting.** Provides a description of the project's regional context, location, and existing physical characteristics and land use. Available public infrastructure and services, as well as relationship to relevant plans, is also provided in this section.
- **Section 3.0 Project Description.** Provides a detailed discussion of the proposed Archstone - Mission Gorge project, including background, objectives, key features, off-site components, and environmental design considerations. The discretionary actions required to implement the proposed project, and a chronicle of project changes, are also included.
- **Section 4.0 Environmental Analysis.** Provides a detailed evaluation of potential environmental impacts for several environmental and land use issues. In accordance with the City's EIR Guidelines, Section 4.0 begins with the issue of land use, followed by the remaining issues included in order of significance. The analysis of each issue begins with a discussion of the existing conditions, a statement of specific thresholds used to determine significance of impacts, followed by an evaluation of potential impacts and identification of specific mitigation measures to avoid or reduce any significant impacts. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is additionally provided.
- **Section 5.0 Significant Unavoidable Environmental Effects/Significant Irreversible Environmental Changes.** Discusses the significant unavoidable impacts of the proposed project, including those that can be mitigated but not reduced to below a level of significance. Only significant cumulative impacts associated with traffic would remain significant and unavoidable even after project mitigation. (All significant direct project impacts can be reduced to below a level of significance through implementation of the recommended mitigation measures.) This section also describes the potentially significant irreversible changes that may be expected with development of the project and addresses the use of nonrenewable resources during its construction and operational life.
- **Section 6.0 Growth Inducement.** Evaluates the potential influence the proposed project may have on economic or population growth within the project area as well as the region, either directly or indirectly.
- **Section 7.0 Cumulative Impacts.** Identifies the impact of the proposed project in combination with other planned and future development in the region.

- **Section 8.0 Effects Found Not to Be Significant.** Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant, and briefly summarizes the basis for these determinations.
- **Section 9.0 Alternatives.** Provides a description of alternatives to the proposed project, including a No Project Alternative and a Reduced Project Alternative.
- **Section 10.0 Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the EIR and required as part of the proposed project.
- **Section 11.0 References Cited.** Lists all of the reference materials cited in the EIR.
- **Section 12.0 Individuals and Agencies Consulted.** Identifies all of the individuals and agencies contacted during preparation of the EIR.
- **Section 13.0 Certification Page.** Identifies all of the agencies, organizations, and individuals responsible for the preparation of the EIR.

1.4.4.2 Technical Appendixes

Technical Appendixes, used as a basis for much of the environmental analysis in the EIR, have been summarized in the EIR, and are printed under separate cover as part of the EIR. The Technical Appendixes are available for review at the City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or at various local library locations. See Section 1.3.1.1 for locations of where these and other referenced documents can be reviewed.

1.4.4.3 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this EIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this EIR, and their relationship to this EIR described. These documents are included in Section 11.0, References Cited, and are hereby incorporated by reference, and are available for review at the City of San Diego Development Services Center, 1222 First Avenue, San Diego, CA 92101.

2.0 Environmental Setting

2.1 Regional Setting

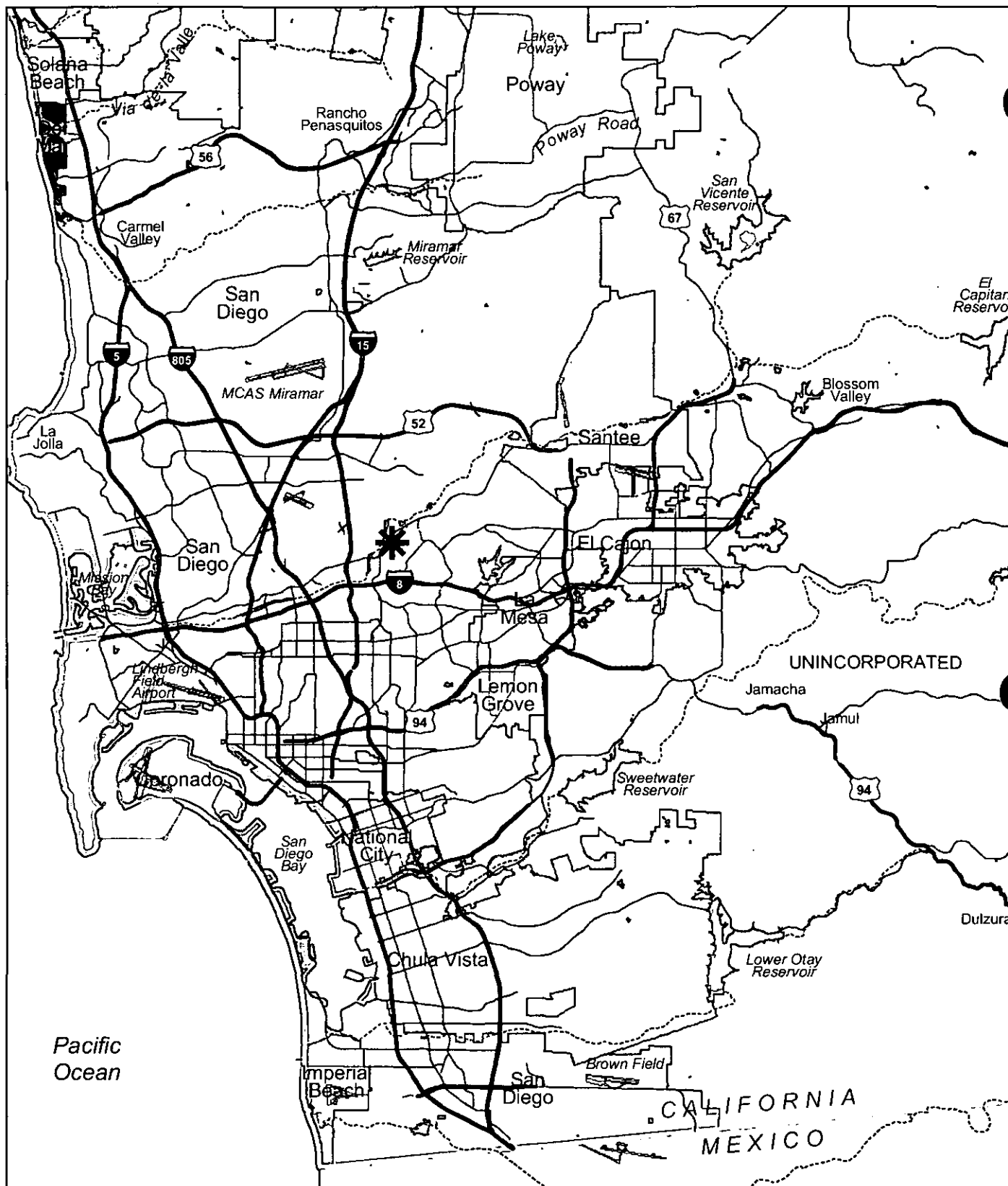
The proposed project site is located within the city of San Diego, within San Diego County, in southern California (Figure 2-1). The city of San Diego covers approximately 320 square miles in the southwestern portion of the county. As shown in Figure 2-1, portions of the city of San Diego lie immediately adjacent to the United States-Mexico border, while the project site and larger portion of the city lies approximately 18 miles north of the United States-Mexico border. Approximately five miles to the east of the project site, and adjoining the eastern limit of the city, lie the cities of Santee, El Cajon, La Mesa, and Lemon Grove, and the unincorporated county of San Diego. The Pacific Ocean forms the city of San Diego's western limit, and the project site lies inland approximately nine miles.

The entire 10.22-acre project site is located in the San Diego community called Navajo. The Navajo Community Plan area encompasses 8,000 acres and is generally bounded by Mission Gorge (the San Diego River gorge) on the north, Interstate 8 on the south, the cities of El Cajon and La Mesa on the east, and by the San Diego River channel on the west. The neighborhoods of Navajo, Allied Gardens, Del Cerro, Grantville, and San Carlos are within the Navajo Community Planning Area. (The community planning context relevant to the proposed project is presented below in Section 2.6.)

2.2 Project Location

The 10.22-acre Archstone – Mission Gorge project site is located approximately 1.25 miles east of the Interstate 15 (I-15) and Friars Road interchange. More specifically, it is located at 6850 Mission Gorge Road at the southwest corner of Mission Gorge Road/Old Cliffs Road intersection and covers one parcel in the city of San Diego (Assessor's Parcel Number [APN] 458-030-17-00). The project site lies within an unsectioned portion of the Mission San Diego Land Grant, Township 16 South, Range 2 West, of the United States Geologic Survey 7.5-Minute Series, La Mesa quadrangle (Figure 2-2).

As shown in the aerial photograph of the project location (Figure 2-3), Mission Gorge Road fronts the eastern border of the project site. Mission Gorge Road provides primary local access to the project site and additionally serves as a regional northeast-southwest travel way through the Mission Gorge/east Mission Valley area and the communities of Navajo and Allied Gardens. Direct access into the project site is taken via a driveway off the west side of Mission Gorge Road, with an uninterrupted median on Mission Gorge



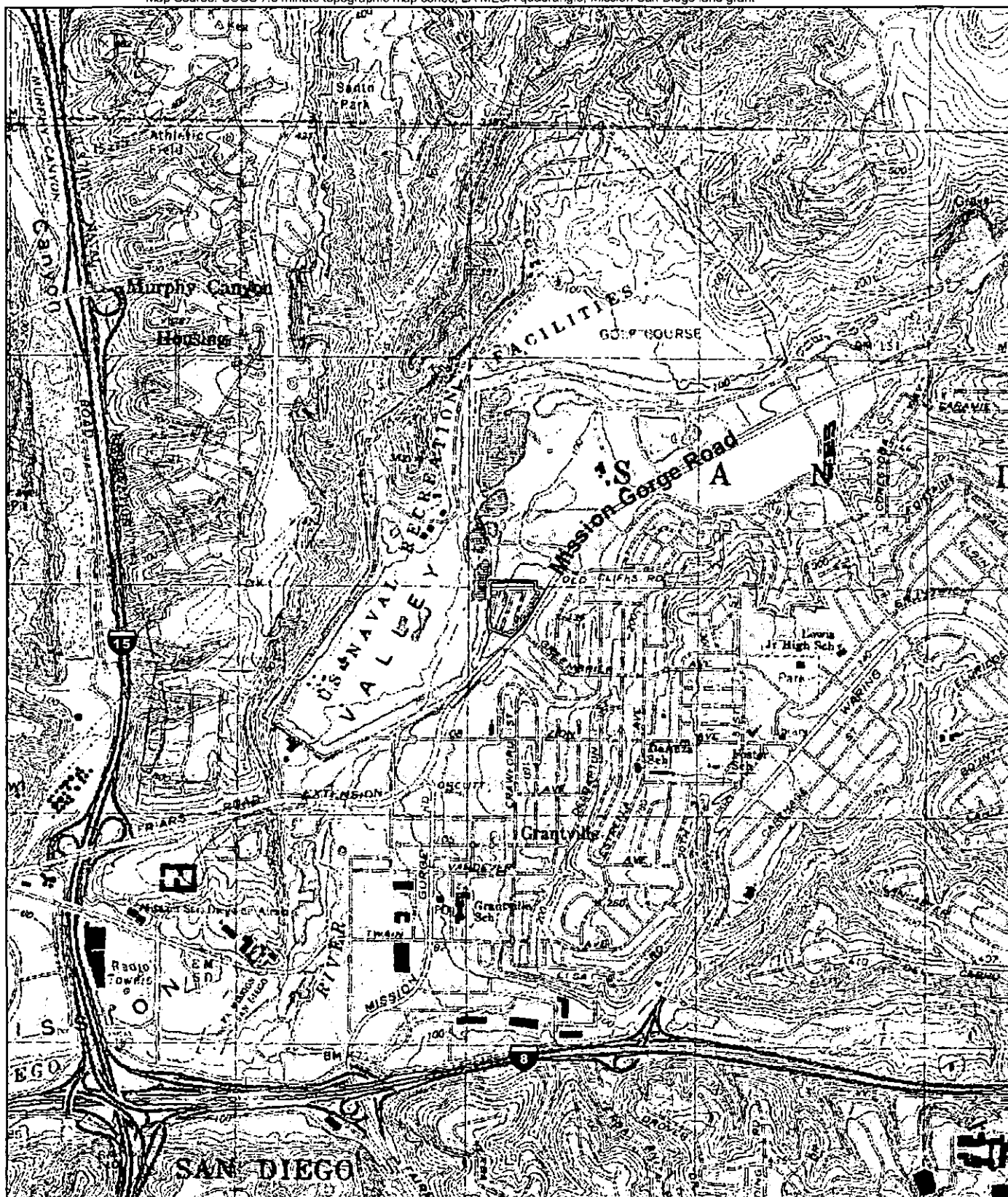
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0 Miles 4 ↑

✱ Project Location

000134

FIGURE 2-1
Regional Location



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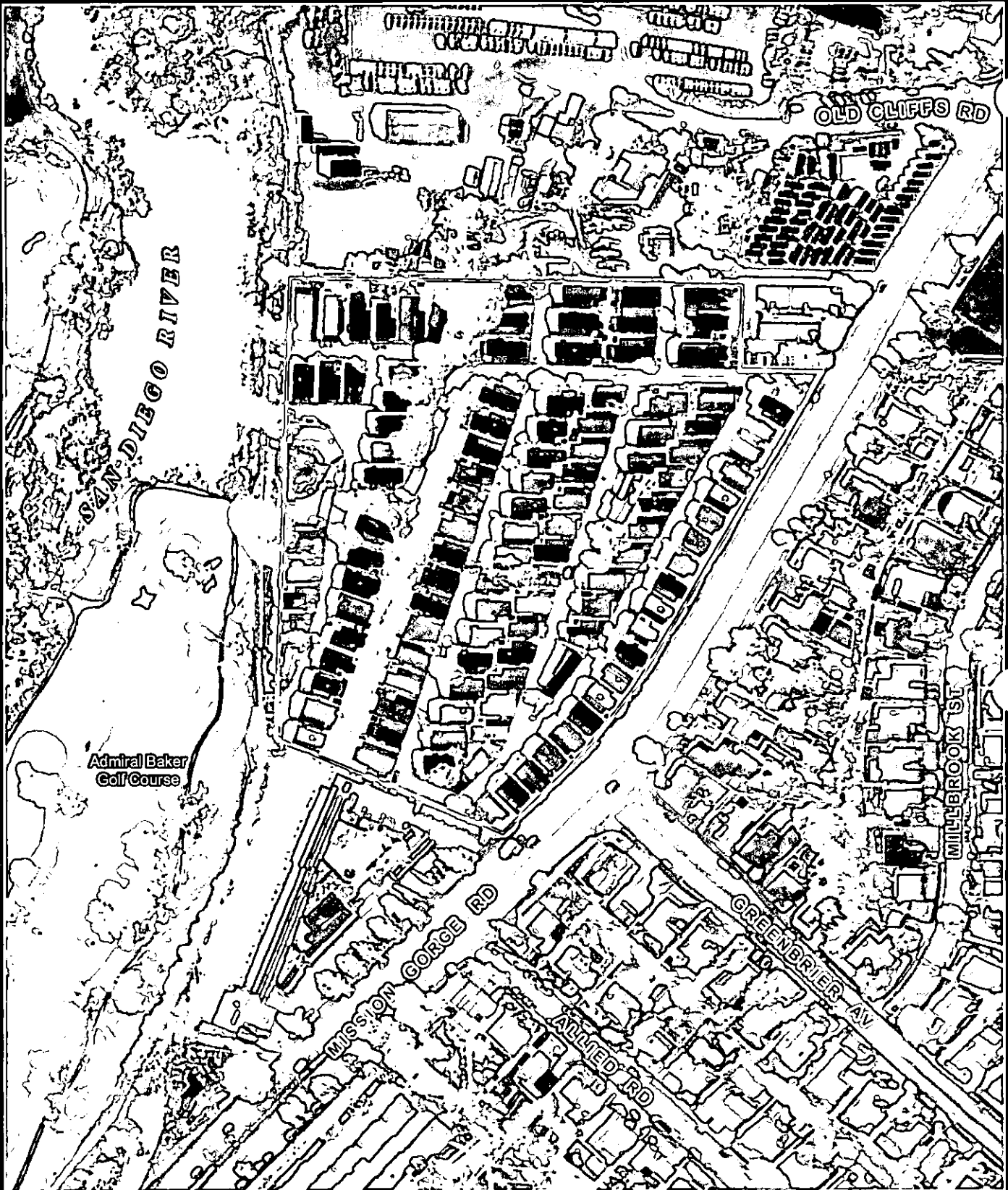
0 Feet 2,000

Project Boundary

FIGURE 2-2

Project Location on USGS Map

000135



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0 Feet 200

Project Boundary

FIGURE 2-3

Project Location on Aerial Photograph

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Road at this location causing northbound traffic to continue north of the project site approximately 400 feet and make a U-turn at Old Cliffs Road.

As shown in Figure 2-3 and discussed in greater detail below in Section 2.4, the north and south edges of the project site are not separated by roads and are bordered by commercial and industrial and residential uses, respectively. A golf course and ponds associated with the golf course and the San Diego River occur outside the west boundary of the project site.

2.3 Existing Physical Characteristics

2.3.1 On-site Physical Characteristics

2.3.1.1 Landcover

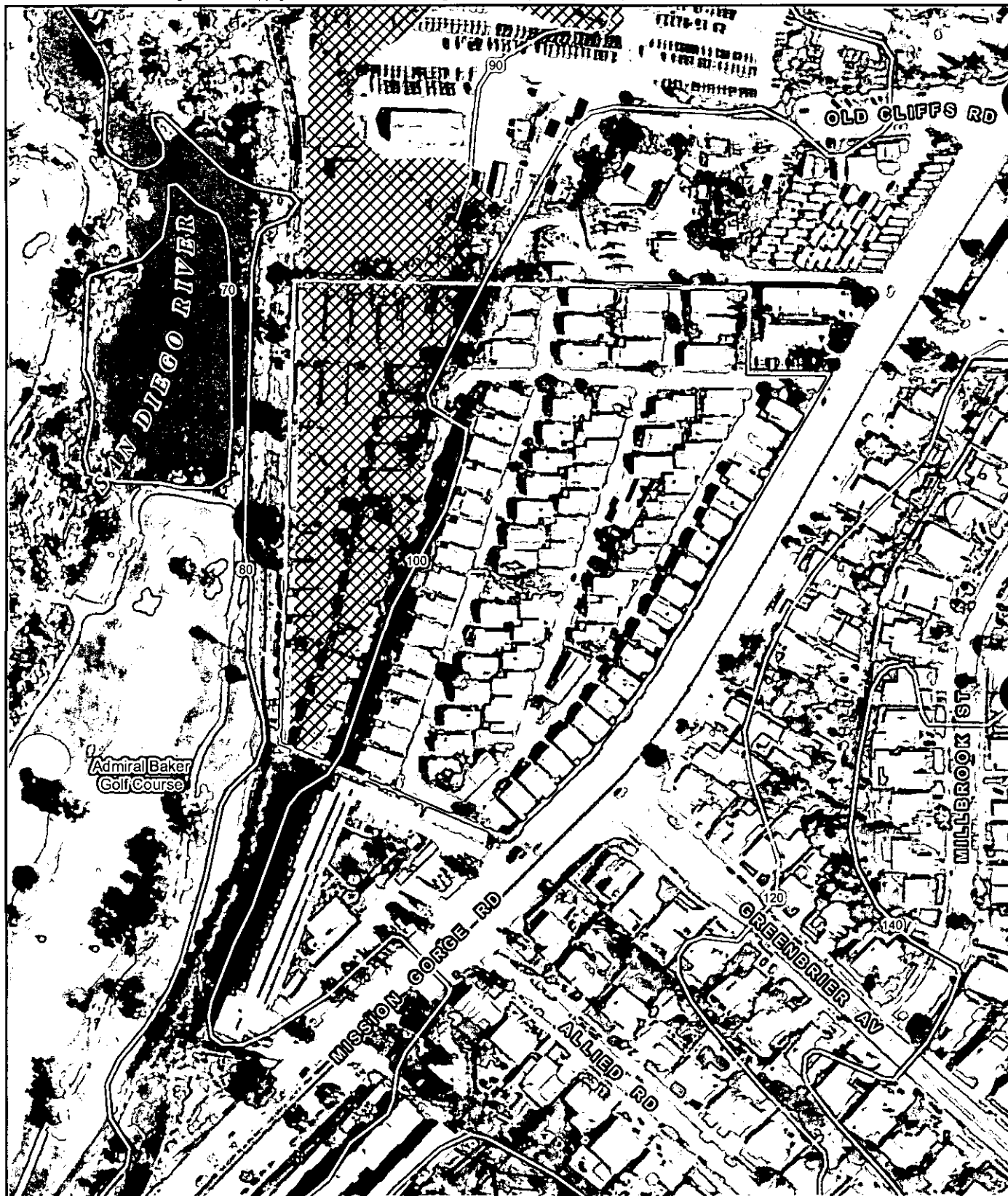
The project site has been previously graded and paved for use as a mobile home park. The entire project site is covered by developed land that includes ornamental vegetation. A total of 26 plant species are known to occur on the project site, three of which are considered native to California and 23 considered non-native. Known wildlife species on-site are those typical of urban settings, including the common bird species of mourning dove (*Zenaida macroura marginella*), Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus frontalis*), and America crow (*Corvus brachyrhynchos hesperis*). (See Section 4.4 of this EIR for a detailed analysis of biological resources on and surrounding the project site.)

2.3.1.2 Drainage

The project site does not contain any wetlands nor any wetland plant species. However, the project site is located adjacent to the eastern bank of the San Diego River, and its 100-year floodplain extends onto the western edge of the project site, covering approximately 2.26 acres of the 10.22-acre site, as shown on panels 1636 and 1637 of the Federal Insurance Rate Maps (FIRM; Figure 2-4). Runoff from the project site drains generally northwest making its way into the San Diego River and eventually the Pacific Ocean nine miles to the west. Pursuant to the City's Storm Water Applicability Checklist, the project site currently discharges runoff to a Water Quality Sensitive Area (the San Diego River). (See Section 4.9 of this EIR for a detailed analysis of drainage and hydrology on and surrounding the project site.)

2.3.1.3 Topography

The project site is characterized by a terraced topography, ranging in elevation of approximately 114 feet above mean seal level (AMSL) on the upper portion of the



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-  Project Boundary
-  100-year Flood Plain

FIGURE 2-4
Existing Topography and
San Diego River Floodplain

000138

project site and 81 feet AMSL on the lower portion of the project site. The upper and lower elevation portions of the project site are separated by an approximate 2:1 (horizontal:vertical) manufactured slope with an access road descending to the lower pad within the slope area. The lower elevation portion of the project site roughly corresponds with the 100-year floodplain of the San Diego River as shown in Figure 2-4.

2.3.1.4 Subsurface

Undocumented fill, alluvial deposits, and terrace deposits underlie the project site. The undocumented fill occurs along the northern and western portions of the project site and was likely placed on-site during construction of the existing mobile home park in 1959. The undocumented fill consists of medium dense clayey sand and silty sand with known depths of generally less than three feet but may extend deeper in some areas. Alluvium was found in the lower elevation portion of the site beneath the undocumented fill. These alluvial deposits consist of loose to medium dense sand and silty sand at depths of approximately 30 feet, and stiff to hard clay at depths deeper than 30 feet. The upper sandy alluvial deposits and the undocumented fill are highly compressible soils considered unsuitable for the support of settlement-sensitive structures. Groundwater occurs at depths of approximately 10 to 12 feet in the lower elevations of the project site and makes this area additionally susceptible to liquefaction. More stable terrace deposits underlie the southeastern portion of the project site and beneath the shallower undocumented fill and alluvial soils in the other areas of the project site. (See Section 4.12 of this EIR for a detailed discussion of the site's geology and soils.)

These depositional soils have a low sensitivity rating for paleontological resource potential according to the City's Paleontological Monitoring Determination Matrix found in the City's Significance Determination Thresholds (January 2007). (See Section 8.3 of this EIR for further discussion of paleontological resources.)

2.3.2 Physical Characteristics of the Surrounding Area

2.3.2.1 Landcover

The types of landcover surrounding the project site are largely developed urban types with ornamental landscaping, similar to the project site, with the exception of open space and natural vegetation along the San Diego River and within the Lake Murray and neighboring Mission Trails Regional Park areas located four miles to the north and east of the project site.

No sensitive plant species which are federally listed as threatened or endangered, or are considered a City of San Diego narrow endemic, are anticipated to occur within two miles of the project site due to the species' range or a lack of suitable habitat. However, the project site is adjacent to the Multiple Habitat Planning Area (MHPA) associated with

the San Diego River, in which several sensitive wildlife species have been known to occur. All sensitive wildlife species known to occur in the project vicinity (within two miles of the project site) that are federally listed threatened or endangered or that have potential to occur based on species range are addressed in the biological resources report attached as an appendix of this EIR, and include the least Bell's vireo (*Vireo bellii pusillus*) and Cooper's hawk (*Accipiter cooperii*). (Further discussion of biological resources and the MHPA is provided in Section 4.7 of this EIR.)

2.3.2.2 Drainage

The project site and surrounding area lie within the San Diego River watershed. More specifically, the project area lies within the Lower San Diego Hydrologic Area, Mission San Diego Hydrologic Subunit number 907.11. The San Diego River transects the project area in a northeast to southwest trend, originating in the Cuyamaca mountains 40 miles northeast of the project site and discharging into the Pacific Ocean through a channel between Ocean Beach and Mission Bay nine miles west of the project site. The river is subject to flooding, and its 100-year floodplain extends beyond its banks into adjacent areas. Rainfall in the area is slightly less than 10 inches a year, and 100-year storm events are rare. Runoff from the north and western portions of the Navajo community drains directly into the San Diego River; while runoff from the southern portion of the community drains to Alvarado Canyon, a tributary to the San Diego River located in the southwest portion of the community. Runoff is either conveyed via culverts and channels directly to the river or flows into storm drains within city streets and is conveyed nine miles west to the ocean. (See Sections 4.8 and 4.9 of this EIR for detailed discussions of water quality and hydrology, respectively.)

2.3.2.3 Topography

The Navajo community is mostly comprised of a wide, flat San Diego River floodplain with steep slopes and mesas along its northern boundary. Formed through the erosive actions of the San Diego River, the community is characterized by a topography that gently slopes from about 800 feet AMSL on the eastern end of the community to around 100 feet AMSL at the western end.

The surrounding project area is characterized by a wide variety of natural features, including flat mesas, steep canyons, and rolling hills, most of which are developed with urban land uses. The most prominent undeveloped natural feature in the area is Cowles Mountain, which is located within Mission Trails Regional Park approximately five miles northwest of the project site, and at 1,591 feet AMSL is the highest point in the city of San Diego. Mission Gorge comprises another unique landform feature of the area and occurs west and northwest of the project site along the San Diego River.

2.3.2.4 Air Quality/Climate

The project area is located within the San Diego Air Basin of the South Coast Air Quality Management District. The area experiences a Mediterranean-type climate and is characterized by cool summers, mild winters, occasional rainfall confined primarily to winter months, and fresh onshore breezes. Average seasonal temperatures range from the upper 70s in the summer with an average daily maximum of 65 degrees in the winter. An average of 10 inches of rainfall occurs annually between November and April.

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds blowing pollutants away from the coast toward inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range. However, periodic temperature inversions occur as descending air associated with the Pacific High Pressure Zone comes into contact with cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants, resulting in poor air quality along the coast. Regional northeasterly Santa Ana winds also periodically overcome the prevailing westerly wind pattern, sending strong, hot, dry winds and pollutants west toward the ocean.

The San Diego Air Basin is classified as a "non-attainment area" as it does not meet federal and state air quality standards for ozone and state standards for particulate matter less than 10 microns in diameter (PM_{10}). Air pollutants transported into the basin from the adjacent South Coast Air Basin (e.g., Los Angeles, Orange County) substantially contribute to the non-attainment conditions in the San Diego Air Basin. (See Sections 4.3 and 7.0 of this EIR for detailed discussions of air quality and cumulative climate change/global warming, respectively.)

2.3.2.5 Transportation/Circulation/Parking

Major roadways within the project area include Mission Gorge Road, Friars Road, Princess View Drive, and Waring Road. Friars Road and Mission Gorge Road are classified as six-lane primary arterials with posted speeds ranging between 45 and 55 miles per hour. Princess View Drive and Waring Road are classified as four-lane major arterials. I-15 is located west of the project site, and I-8 lies further to the south. Traffic on all local roadway segments within the project area currently flows at acceptable levels as defined by City thresholds. However, the Friars Road/northbound I-15 ramp currently operates at unacceptable levels during the evening peak hour.

No parking is permitted along Mission Gorge Road adjacent to the project boundary. Street parking is allowed on other streets in the vicinity and elsewhere in the community.

There are two transit opportunities within the vicinity of the proposed project. The trolley service travels parallel to Friars Road and the closest trolley stop in Grantville is on Alvarado Canyon Road. The bus stops in locations to the south and east of the project site.

Within the project area, Mission Gorge Road includes a shared Class III bicycle route on each side (See Section 4.2 of this EIR for a detailed discussion of traffic, circulation, parking and transit.)

2.4 Existing Land Uses

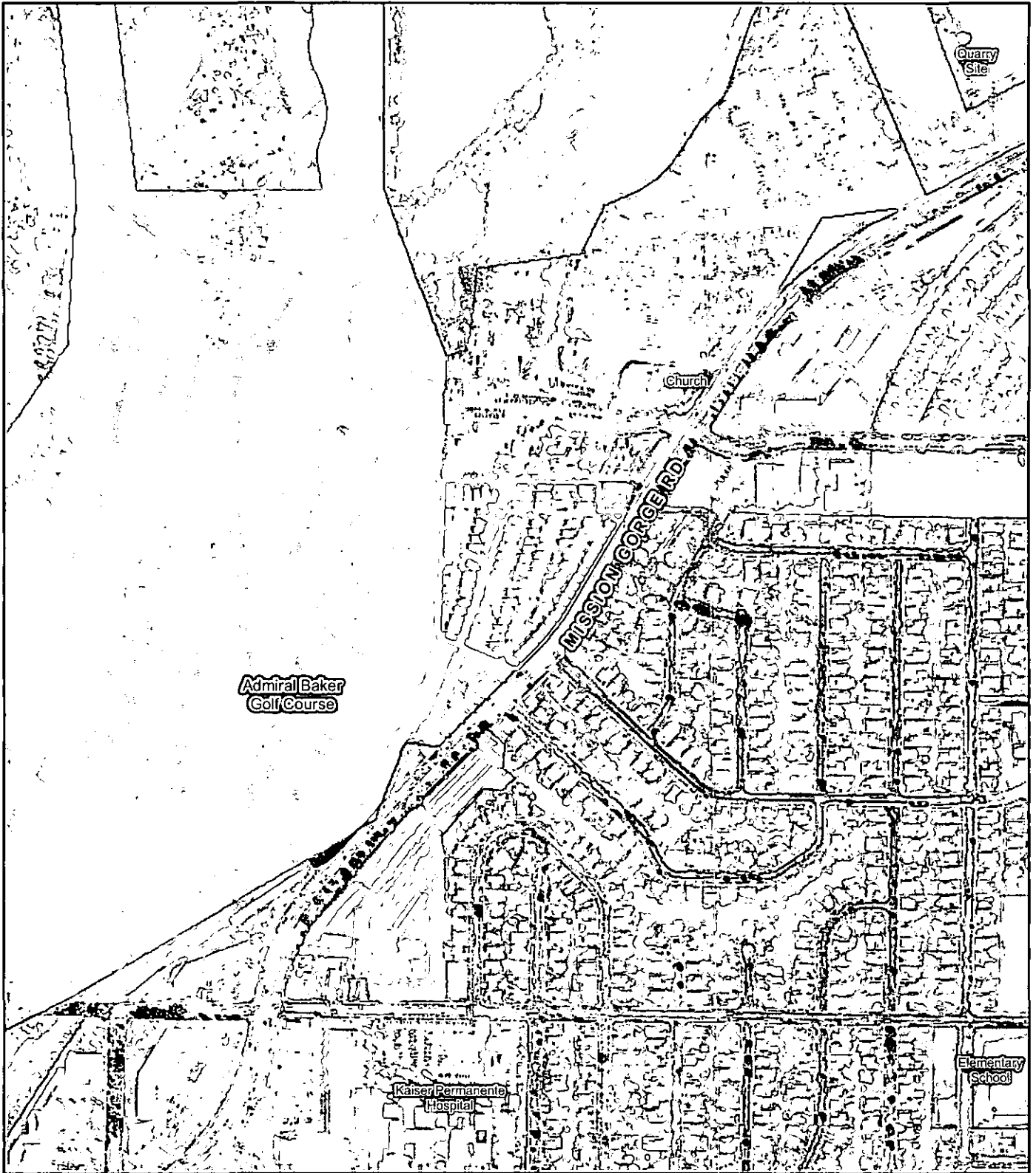
2.4.1 On-site Land Uses

The Archstone – Mission Gorge project site is the location of a mobile home park that has been in existence under a Conditional Use Permit (CUP) since 1959. Named Mission Valley Village, the mobile home park currently provides 119 mobile home spaces (not all of which are currently occupied), an office building, recreation hall, pool, spa, and laundry facilities, as well as several automobile parking spaces adjacent to the laundry facilities.

The on-site mobile homes range in age from 2 to 46 years and range in size from 384 to 1,620 square feet. Most of the mobile homes in the park are used as permanent homes bringing the population in the park to approximately 136 individuals (as identified during a July 2007 field survey provided in the mobile home park relocation impact report attached as an appendix to this report). The average tenure of the park tenants is approximately 10 years. (For more information about the existing mobile home park tenants and their relocation, see Section 4.11, Population and Housing.)

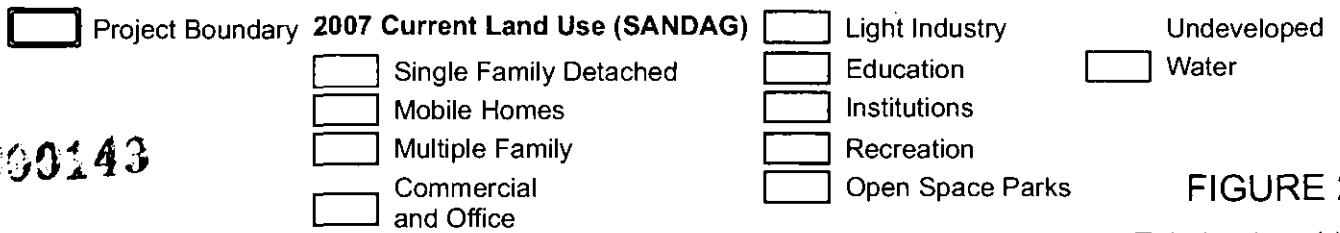
2.4.2 Surrounding Land Uses

Existing land uses in the project vicinity are shown in Figure 2-5. The Archstone – Mission Gorge project site is bordered on the north by light industrial and industrial storage land uses adjacent to Old Cliffs Road and Mission Gorge Road. Multi-family residential uses are also located north of the project site, adjacent to the northeast corner of the project site abutting Mission Gorge Road (refer to Figure 2-5). Approximately one-quarter mile northeast of the project site lies a second mobile home park (one of two, including the project site, in the Navajo community) covering approximately 33 acres at the east end of Old Cliffs Road. This mobile home park (named The Cliffs) accommodates 262 spaces and includes an office, recreation center, and laundry facilities. The 395-acre Mission Gorge Superior Mine, an ongoing sand and



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FIGURE 2-5
Existing Land Use

2.0 Environmental Setting

gravel quarry operation, lies approximately one mile north of the project site on the west side of Mission Gorge Road.

Immediately to the south of the project site lies multi-family residential use, the River Greens Condominiums. Arterial commercial and community shopping lie further to the south. Mission Gorge Road, a six-lane primary arterial with an uninterrupted 14-foot-wide raised median, lies east of and adjacent to the project site. Further to the east, across Mission Gorge Road, are single-family and multi-family residential uses, with scattered commercial uses along the Mission Gorge Road frontage, as well as recreational (playing fields) and institutional uses (elementary school and hospital). Approximately one-quarter mile south of the project site, east of Mission Gorge Road, lies the Kaiser Permanente Hospital; and further east of the hospital lies Foster Elementary School (refer to Figure 2-5). Land uses west of the project site include a golf course and pond/waterway, associated with the Navy's Admiral Baker Golf Course and the San Diego River.

2.4.3 Historical Land Uses/Cultural Resources

The Mission Gorge (a major gorge of the San Diego River) comprises a unique landform feature of the area that occurs west/northwest of the project site. The river gorge is the site of the early Mission Dam and is a State Historical Landmark.

While the project site contains no known historic or significant cultural resources, it is located adjacent to an area having high sensitivity for archaeological resources, as discussed in Section 4.5 of this EIR. There are two known important cultural resource sites located in proximity to the project site. These include the Kumeyaay village of Nipaquay and the Mission San Diego Alcalá, located on the west side of the San Diego River. Several other recorded sites lie within one mile of the project site.

2.5 Public Infrastructure

The City of San Diego collects Development Impacts Fees (DIFs) from new development to assist in funding community-wide public services and facilities, and as a means to mitigate new development's impact on infrastructure and public services. DIFs collected at the time of building permit issuance are deposited in a special interest-bearing account used only for the identified facilities serving the community in which they are collected. As sufficient funds are collected, the City proceeds with construction programs. In addition, all development projects within the city are required to pay school fees in accordance with the requirements of the San Diego City Schools, and as mandated by state law, to accommodate the needs of public schools serving existing and new development-generated students. New developments within the Navajo Community Plan area would thus be required to pay DIFs in accordance with the Navajo

Public Facilities Financing Plan (PFFP) and school fees in accordance with the requirements of San Diego City Schools.

Community-wide public utilities, such as water and sewer infrastructure, and solid waste disposal, are also funded through DIFs and managed through the City's Capital Improvements Projects (CIP) program. The City conducts bi-annual review of public services, facilities, and utilities implementation in conjunction with the budget/CIP review cycle. As part of this review process, the City assesses the need for new or expanded services and public facilities in order to provide appropriate service levels commensurate with population increase and new development. To ensure that development does not occur unless facilities and improvements are available to support that development, the CIP program and PFFP review cycle includes a defined public facilities phasing policy to appropriately schedule the timing and location of City improvements.

2.5.1 Fire, Emergency Medical, and Police Services

Fire, emergency medical, and police protection services are currently available within the Navajo Community Plan area. The following provides a discussion of the existing and planned fire and police protection services and facilities that serve the Navajo community. The information provided below is based on service letters prepared by Assistant Fire Marshall Frankie Murphy and Walt Vasquez, Captain, Operational Support Division. These letters are included in Appendix B of this EIR.

2.5.1.1 Fire Protection

Fire protection services to the project area are provided by the City of San Diego Fire-Rescue Department. The General Plan states that fire stations should be sited on lots that are at least three-quarters of an acre with room for expansion within two to two and a half miles apart and be staffed and equipped to respond to calls within their established standards. The City of San Diego Fire-Rescue Department's goal is one firefighter per 1,000 citizens. To ensure adequate fire protection response to fire calls, the City's Fire-Rescue Department adheres to national standards which require that initial response of fire suppression resources, four-person engine company within five minutes, and an effective fire force, 15 firefighters, within nine minutes of a call.

Fire Station 45 provides primary fire protection and advanced life support services to the project site and surrounding area. Fire Station 45, located approximately 2.6 miles southwest of the project site at 9499 Friars Road, houses one engine company staffed by four firefighters, one of which is also a paramedic. Fire Station 45 is a temporary fire station located in the parking lot of Qualcomm Stadium that will remain in place until a permanent replacement is built.

2.0 Environmental Setting

A new permanent fire station is planned to be located at the intersection of Friars Road and Mission Village Drive, approximately 2.6 miles west of the project site, and would replace the temporary station (Fire Station 45) located at Qualcomm Stadium. The new station would comprise a four- or five-base station including a medical unit, a rescue unit, and fire trucks.

Three additional fire stations (Fire Stations 31, 18, and 14) would serve the project site under first alarm conditions or when Station 45 is not available to respond to a fire or medical emergency.

- Fire Station 31 is located at 6002 Camino Rico and houses Engine 31, a triple combination pumper, and a paramedic unit.
- Fire Station 18 is located at 4676 Felton Avenue and houses one engine company staffed by four firefighters, one of which is also a paramedic, and a brush rig.
- Fire Station 14 is located at 4011 32nd Street and houses one engine company, one truck company, and one Battalion Chief. Eight firefighters are currently stationed there, two of which are also paramedics.

All fire department engines and trucks are full Advanced Life Support (ALS) units and are equipped and capable of managing medical emergencies.

Table 2-1 below shows the typical first alarm assignment that would respond to the project site, and estimated response times. The first alarm response times were calculated using ERMS (Emergency Response Management System) programming, routed point to point, and include standard chute/turnout time for the northwest corner of Mission Gorge Road and Old Cliffs Road intersection. Table 2-1 also shows the average response times for all calls for fiscal year 2007 for each of the fire stations that would serve the project, as well as the average number of incidents responded to.

TABLE 2-1
FIRE STATION RESPONSE TIMES
 (minutes)

Fire Station ¹	Response Time	2007 Average Response Time	2007 Incidents Responded To ²
45 (Engine 45)	4.8	5.58	1,234
31 (Engine 31)	5.0	5.33	1,246
18 (Engine 18)	6.7	4.4	2,180
14 (Truck 14)	8.0	5.57	767

SOURCE: City of San Diego Fire-Rescue Department, Fire Prevention Bureau, personal communication with Assistant Fire Marshall Frankie Murphy, February 4, 2008.

¹Fire Station apparatus in parentheses (above) indicate the typical first alarm assignment that would respond to a first alarm; and does not represent the full array of resources at each fire station or equipment assignments employed for non-first alarm incidents.

²The national standard for workload capacity is 2,500 incidents per engine.

As indicated in Table 2-1, the fire stations that serve the project site would not exceed the national standards for initial response or effective fire force. The initial fire suppression unit would arrive within 4.8 minutes (i.e., below the maximum five-minute standard) and the effective fire force would arrive within eight to nine minutes (i.e., below or at the maximum nine minute standard). Year 2007 average response times citywide slightly exceed five minutes for most of the responding fire stations.

2.5.1.2 Emergency Medical

Emergency medical services are provided to the project site and throughout the city of San Diego through a public/private partnership between the City's Emergency Medical Services (EMS) and Rural Metro Corporation, which provides some personnel and some ambulances.

EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. There are four levels of calls. Level 1 is the most serious (i.e., heart attack, shortness of breath, etc.), and the closest fire engine and an advance life support ambulance respond to this type of call. The fire crew has to respond within eight minutes of being dispatched pursuant to City contract requirements, and the ambulance has to respond within 12 minutes. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advance life support ambulance responds to Level 2 calls; no fire station staff or equipment are deployed. The response time for a Level 2 call is 12 minutes, the same as for a Level 1 call. For a Level 3 call (i.e., someone having extended flu-like symptoms), either a basic or advance life support ambulance would respond. A basic ambulance is staffed with two EMTs whereas an advance life support ambulance is staffed with one paramedic and one EMT. The response time for a Level 3 call is 18 minutes. For a Level 4 call, which is not an emergency (i.e., the patient could have driven themselves to a hospital), a basic ambulance would respond within 18 minutes of

being dispatched. EMS is under contract to meet the 12- or 18-minute response times at least 90 percent of the time.

2.5.1.3 Police Protection

Police services are provided by the San Diego Police Department. The police department does not staff individual stations based on population ratios. The goal citywide is to maintain 1.67 officers per 1,000 population ratio. The current budgeted staffing ratio is 1.59 officers per 1,000 residents.

The Police Department currently uses a five-level priority dispatch system, which includes, in descending order: priority E (Emergency), One, Two, Three, and Four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units; the radio dispatcher has the discretion to raise or lower the call priority as necessary based on information received. Priority E and Priority One calls involve serious crimes in progress or those with a potential for injury.

The department's goal response times are seven minutes for emergency calls; 12 minutes for priority one calls; 30 minutes for priority two calls; and ninety minutes for priority three and four calls.

The project site is located within the boundaries of police Beat 322 of the City of San Diego Police Department, Eastern Division Substation. The Eastern Division Substation is located approximately four miles northeast of the project site at 9225 Aero Drive and is currently staffed with 106 sworn personnel and 7 non-sworn personnel. Additional resources (such as SWAT, canine units, etc.) respond to Eastern Division as needed. The current patrol strength at Eastern Division is 92 uniformed patrol officers. Officers work 10-hour shifts, four days a week. Using the Department's minimum staffing guidelines, Eastern Division currently deploys a minimum of nine patrol officers on first watch (6 A.M. to 4 P.M.), 11 officers on second watch (2 P.M. – midnight), and eight officers on third watch (9 P.M. – 7 A.M.).

Additional police services for the project area are provided by the Police Community Relations Office (also called the Navajo Storefront), located at 7381 Jackson Drive, approximately five miles east of the project site. This facility is a community outreach facility that houses one police officer and one community service officer to provide crime prevention education and information services. Officers are not dispatched on radio call from this location. There are no current plans for additional police substations in the immediate project area.

Table 2-2 below shows the year 2007 average response times for each priority level call within Beat 322. Also included in Table 2-2 are the citywide averages and Police Department goal response times.

**TABLE 2-2
POLICE RESPONSE TIMES
(minutes)**

Call Types	Beat 322 Average Response Times	Citywide Average Response Times	Department Goal Response Times
Emergency	8.26	7.22	7
Priority One	13.41	13.62	12
Priority Two	21.94	25.38	30
Priority Three	48.24	65.53	90
Priority Four	62.05	62.43	90

SOURCE: City of San Diego Police Department, Operational Support Division, personal communication with Captain Walt Vasquez, January 30, 2008.

As indicated in Table 2-2 above, the average response times for Beat 322 exceed the citywide average and Police Department goals for emergency and priority one calls, but are less than the citywide average and goal response times for priority two, three, and four calls.

2.5.2 Public Utilities

The following provides a brief description of the existing public water, sewer, and solid waste utilities that are available to serve the Navajo community. Section 4.4 of this EIR provides a more detailed discussion of public utilities, including evaluation of infrastructure capacity and project needs.

2.5.2.1 Water

The City of San Diego provides potable and reclaimed water service to the project area via an existing 12-inch public water main located along Mission Gorge Road. Water is distributed on-site through private water lines that connect laterally to the public water main in Mission Gorge Road. Water is conveyed to the project site and surrounding area from the Alvarado Filtration Plant, located approximately three miles southeast of the project site at the mouth of Lake Murray.

2.5.2.2 Sewer

The Metropolitan Wastewater Department collects and treats wastewater generated on-site and in the surrounding community. Metro sewer collection facilities are located in Mission Gorge Road adjacent to the project site and connect laterally to existing on-site private sewer lines. Wastewater collected in Mission Gorge Road is conveyed west through various interceptors and pump stations and then finally to the City's Point Loma Wastewater Treatment Plant, located approximately 11 miles southwest of the project site.

2.5.2.3 Solid Waste

Solid waste generated in the project area is collected by private franchised haulers and taken to either the City's Miramar Landfill, Sycamore Sanitary Landfill, or Otay Landfill. Current disposal tonnages at all City landfills are approaching capacity, and based on projected disposal rates and permitted disposal limits, the San Diego region is anticipated to exceed landfill capacity within the next few years unless landfill expansions are approved.

The City of San Diego has adopted several programs and policies to reduce solid waste generation within its borders in response to landfill constraints and the state's 1989 Integrated Waste Management Act which mandated that all cities reduce waste disposed of in landfills by 50 percent. The City of San Diego Environmental Services Department (ESD) developed the Source Reduction and Recycling Element to plan and manage the City's long-term disposal needs and achieve mandated waste reduction goals. For private development projects, ESD requires the preparation of a Waste Management Plan (WMP) for reducing waste generated during project construction and post-construction project operation. In addition, the City Recycling Ordinance (adopted November 2007) requires multi-family residential uses to provide on-site recycling and recycling education (effective January 1, 2009 for multi-family units of 50 or more). The Archstone - Mission Gorge project would comply with City waste reduction requirements through preparation and implementation of a project waste management plan and adherence to applicable City ordinances and codes.

2.6 Planning Context

Development projects in the City of San Diego are generally guided by the City's General Plan, and more specifically by the applicable community plan. In addition, various other city, regional, and state plans, programs and ordinances regulate the development of land within San Diego.

The following provides an overview of the planning context and focuses on the key planning and regulatory documents affecting development of the proposed project. A detailed evaluation of the project's consistency with relevant plans and ordinances is additionally provided in Section 4.1, Land Use, of this EIR. In addition, Section 3.6 of this EIR, Project Features or Environmental Design Considerations, describes how applicable elements of these plans, policies and regulations have been incorporated into the project design.

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2.6.1 City General Plan

State law requires each city to adopt a general plan to guide its future development, and mandates that the plan be periodically updated to assure its continuing relevance and value (State Planning and Zoning Law, California Government Code, Section 635300). State law also requires the inclusion of seven mandatory elements into the General Plan (land use, circulation, housing, conservation, noise, open space, and safety), but permits flexibility and the inclusion of optional elements to best meet the needs of a particular city.

2.6.1.1 Strategic Framework Element

The Strategic Framework Element was adopted in October 2002 and represented the City's new strategy to redirect new development and infill development away from undeveloped lands into already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit opportunities. This strategy, referred to as the City of Villages strategy, builds upon regional planning and smart growth principles and aims to preserve remaining open space and natural habitat and focus development within areas with available public infrastructure.

Through policies developed in the following eight areas: urban form, neighborhood quality, public facilities and services, conservation and the environment, mobility, housing affordability, economic prosperity and regionalism, and equitable development; the Strategic Framework Element envisions a city of mixed-use, village-style development, where uses are integrated in a manner that offers a variety of housing types, is pedestrian friendly and provides efficient transit service and public facilities densities.

The proposed Archstone – Mission Gorge project, comprising a medium-density rental housing infill/redevelopment project with on-site recreational and commercial uses, provision of affordable housing, and adjacency to existing and planned bus transit, would conform to the City of Villages strategy identified in the Strategic Framework Element.

2.6.1.2 General Plan

A comprehensive update to the City's original 1979 General Plan was adopted on March 10, 2008 that reflects the City of Villages strategy developed in the Strategic Framework Element. The new General Plan is comprised of the following 10 elements: Strategic Framework and Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Historic Preservation; Noise; and Housing. These elements contain citywide goals and policies to implement the City of Villages strategy and to direct the preparation of updated/amended community plans. The City's individual community plans, in

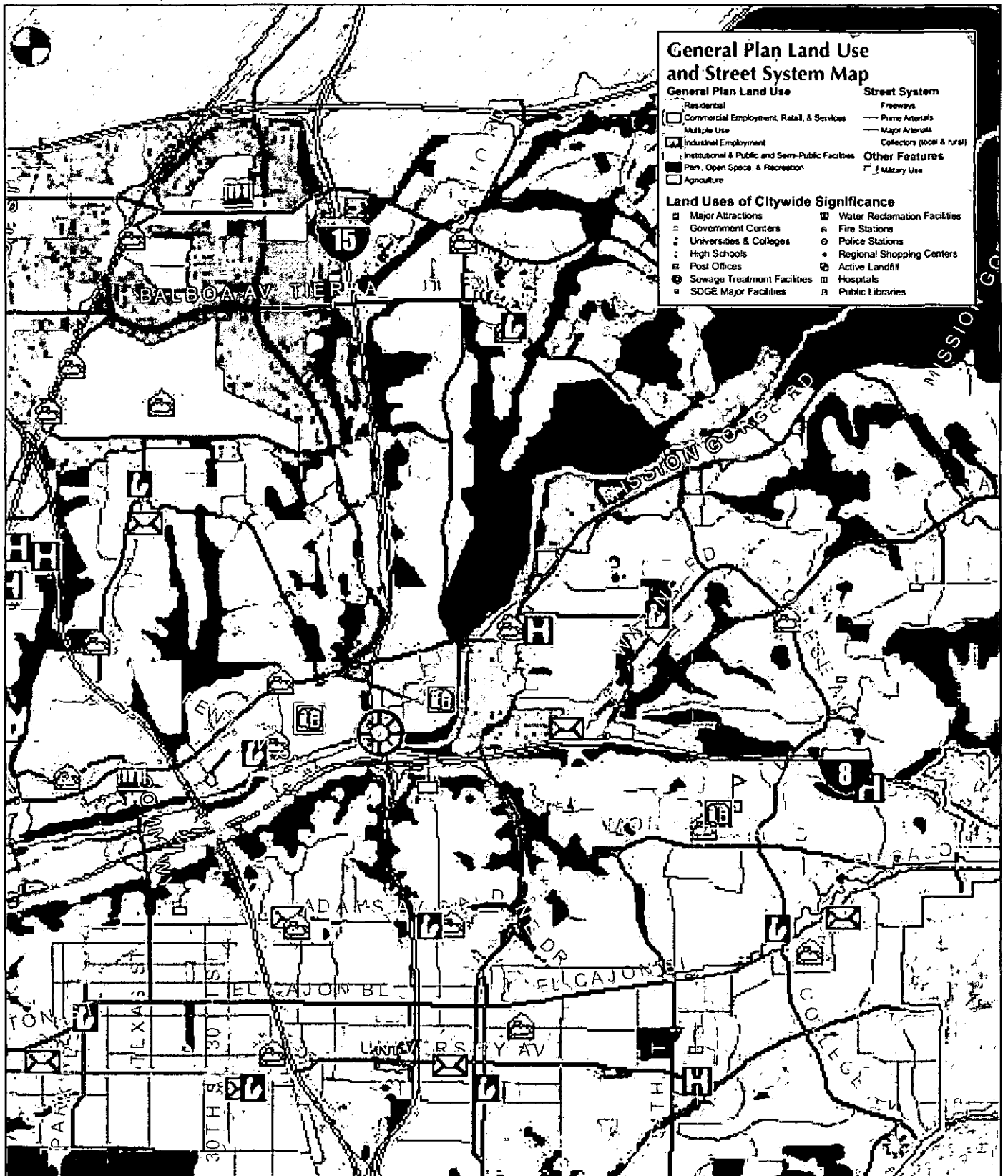
aggregate, make up the land use element's more refined, community-specific recommendations and are bound under separate cover with varying dates of adoption. The housing element is likewise bound to a different timeline than the General Plan and is bound under separate cover. California Government Code mandates housing elements to be updated every five years. The most recent City housing element was adopted in December 2005 and addresses the five-year interval of 2005 to 2010.

The Archstone – Mission Gorge project site is identified in the General Plan's Land Use and Street System Map (contained in the Land Use and Community Planning Element) as Residential (Figure 2-6), with a moderate propensity for village development (as shown on the Village Propensity Map, replicated as Figure 2-7). The project site is considered to possess moderate as opposed to high village propensity given the constraint of the MHPA/open space area to the west. Factors considered in locating village sites and ranking village propensity include community plan-identified capacity for growth; existing public facilities or an identified funding source for facilities; existing or an identified funding source for transit service, community character, and environmental constraints. Village propensity also takes into consideration the location of parks, fire station, and transit routes. By overlaying the facilities factors with the land uses, the Village Propensity Map of the General Plan illustrates existing areas that already exhibit village characteristics, and areas that may have a propensity to develop as village areas.

The proposed Archstone – Mission Gorge multi-family residential rental condominium complex, with integrated passive open space areas and pedestrian and bicycle trail access having regional connectivity (to the San Diego River Park and Mission Trails Regional Park), and on-site active recreational facilities, nearby existing and adjacent planned transit (bus and trolley) stops, and inclusion of 20 percent affordable housing per agreement with the City's Housing Commission, would conform with the village concept of the City of Villages strategy and objectives of the General Plan. However, as described below in Section 2.6.2.2, a Mobile Home Park Overlay Zone (MHPOZ) currently overlays the project site, limiting development to mobile home park use (or, through compliance with additional regulations, the discontinuance of existing mobile home park use and conversion to other uses.) A General Plan Amendment (GPA) is thus being requested by the project applicant, in concert with the request for a Community Plan Amendment (CPA) and Rezone, to remove the project site from the MHPOZ. Approval of the GPA and CPA would allow development of the site that conforms with General Plan objectives to intensify land use and provide more varied housing within already developed areas of the city.

2.6.2 Navajo Community Plan

The project site lies within the western portion of the NCP area. The NCP area encompasses approximately 8,000 acres and is generally bounded on the north by Mission Gorge (the river gorge), on the south by I-8, on the east by the cities of El Cajon



 Project Boundary

NOT TO SCALE



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FIGURE 2-6
General Plan Land Use



 Project Boundary

NOT TO SCALE



FIGURE 2-7

General Plan Village Propensity

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and La Mesa, and on the west by the San Diego River channel. Originally approved in 1982, the NCP was most recently reprinted in February 2008 and includes the Centerpointe at Grantville Amendment approved in 2007, the August 2002 amendment to the circulation and public transportation element, and the Grantville Amendment approved in 1989.

The NCP contains community-specific development objectives and policies within its 10 elements that are refinements of citywide policies contained in the General Plan. The NCP includes the following elements: residential, commercial, industrial, mixed use, open space retention and utilization, parks and recreation, public schools, other community facilities, circulation, and community environment. In addition to community-specific policies, the NCP contains additional site-specific development criteria in the form of land use/zone overlays and design district overlays. Typically, these overlays have been adopted by ordinance and are contained in the City's Municipal Code. The project site lies within two overlay zones as described in the following paragraphs, and more fully in the discussion of the Municipal Code in Section 2.6.5 below.

2.6.2.1 Underlying Land Use Designation

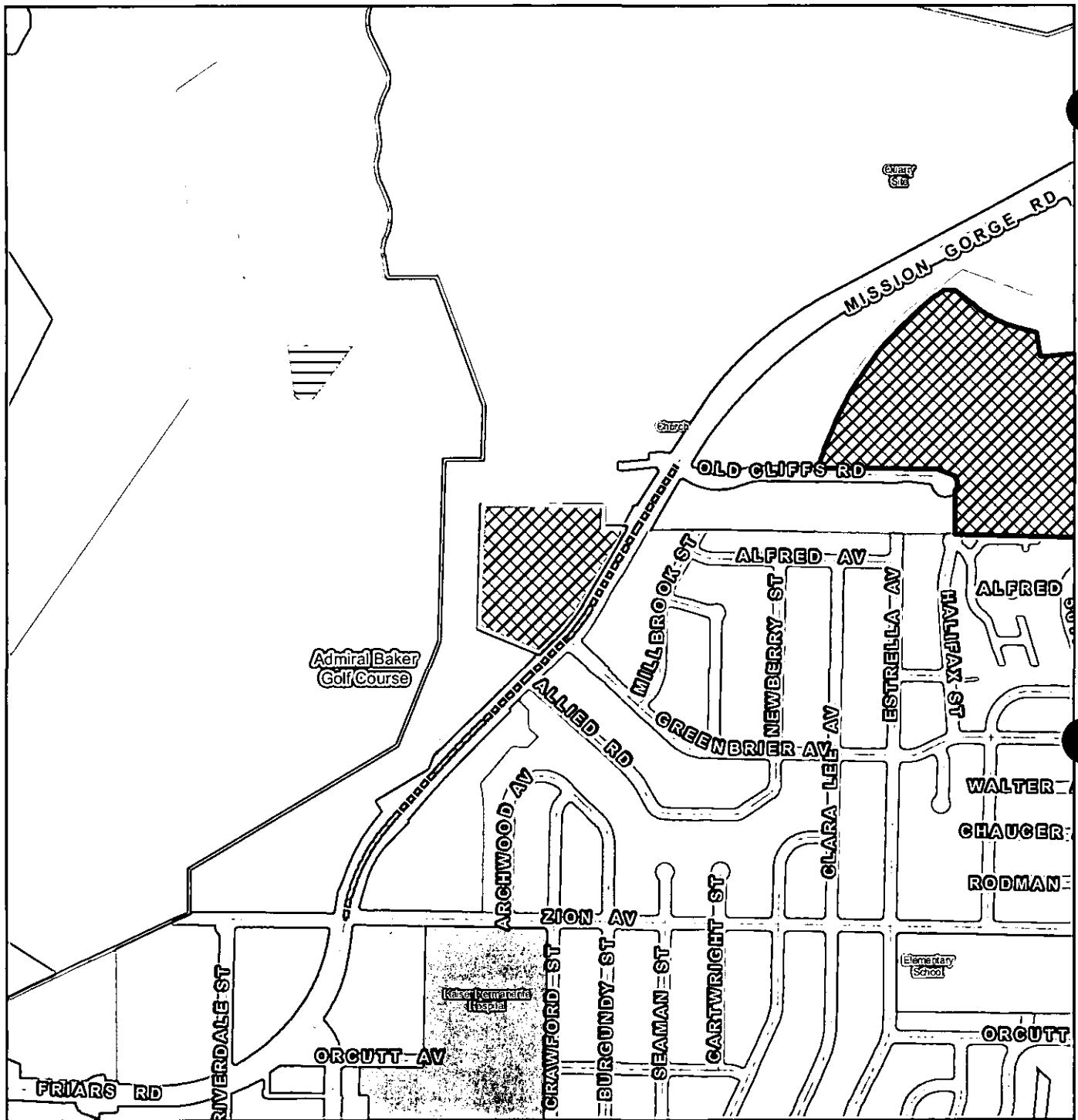
Figure 2-8 shows the underlying land use designation and overlay zones for the project site and surrounding area. As shown, a wide variety of land uses are represented in the western portion of the Navajo community, including detached single-family homes, attached multi-family residential uses, and some commercial and light industrial centers situated along both sides of Mission Gorge Road. The central and eastern portions of the community plan area are designated primarily as residential neighborhoods.

The project site is designated Multi-Family Residential which allows a medium-high density of 30 to 43 dwelling units per acre. The proposed project is consistent with this medium-high density residential designation and proposes a 444-unit rental-condominium complex over 10.22 acres.

2.6.2.2 Mobile Home Park Overlay Zone

The project site is overlain by the MHPOZ, as indicated in Figure 2-8. The MHPOZ was applied to the existing project site mobile home park and to a second mobile home park located less than one mile to the northeast and was intended primarily "to ensure the availability of varied housing types to create a more balanced community" (Navajo Community Plan, p. 15). In keeping with the intent to provide varied housing types, the project proposes a one-, two-, and three-bedroom multiple-unit development, with 20 percent of the units set aside as affordable housing for low and moderate income tenants per agreement with the City's Housing Commission.

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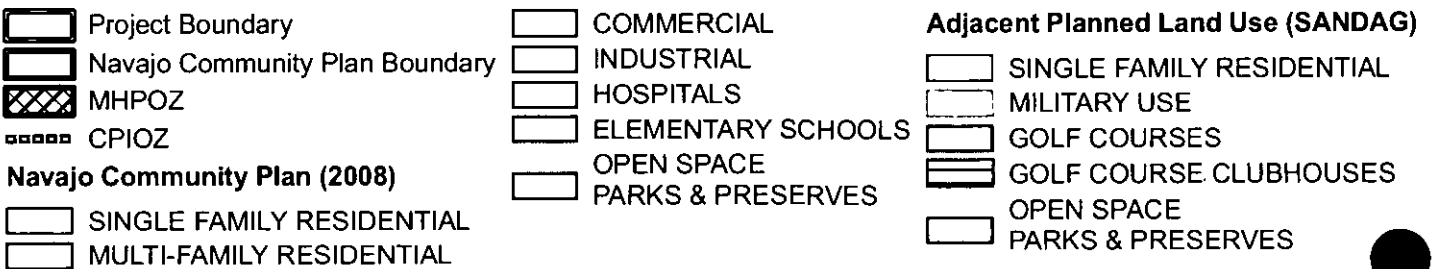


FIGURE 2-8
Navajo Community Plan
Land Use and Overlays

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In order to implement the project, however, the project applicant is seeking an amendment to the Navajo Community Plan (and by extension, the General Plan) to remove the MHPOZ. As described below in Section 2.6.5, the Municipal Code pertaining to the MHPOZ outlines procedures for the discontinuance and conversion of existing mobile home parks and references supplemental procedures contained in the Mobilehome Park Discontinuance and Tenant Relocation Regulations. Approval of the CPA and MHPOZ removal in accordance with these procedures would allow development of the site in conformance with the underlying NCP land use designation of Multi-family Residential and with the objectives of the NCP to provide more varied and affordable housing within the community. (See Section 4.1 of this EIR for a more detailed discussion of the proposed project's consistency with the NCP and MHPOZ.)

2.6.2.3 Community Plan Implementation Overlay Zone – Area B

In order to ensure quality site design along Mission Gorge Road, the NCP applies a Type B Community Plan Implementation Overlay Zone (CPIOZ) to the residential properties abutting Mission Gorge Road between Old Cliffs Road and Zion Avenue. The project site lies within this CPIOZ area (see Figure 2-8). Adopted by ordinance as part of the City's Municipal Code, the purpose of the CPIOZ is to provide supplemental development regulations tailored specifically to residential properties abutting Mission Gorge Road and to ensure that development proposals are reviewed for consistency with the use and development criteria of the NCP. As described below under the Municipal Code discussion, Section 2.6.5, this assurance is provided through processing of a SDP (Municipal Code, Section 132.1401 et seq.).

The NCP CPIOZ includes several development regulations supplemental to the NCP and Land Development Code (LDC) general development regulations that relate to neighborhood compatibility, building height, landscaping, streetscape improvement, San Diego River floodway setback and stepback, and River and pedestrian connectivity (walkways). The issue of project consistency with these NCP CPIOZ supplemental development regulations is discussed more fully in Sections 4.1 (Land Use) and 4.10 (Visual Effects and Neighborhood Character) of this EIR. Generally, it can be concluded that the design of the proposed project would be consistent with the specific design criteria for residential properties abutting Mission Gorge Road, and, through a Type B/SDP application and approval, would implement the NCP objectives for this CPIOZ area.

2.6.2.4 Mission Trails Design District

The NCP indicates that all multi-family residential and commercial designations within the NCP area are additionally subject to the design guidelines of the Mission Trails Design District (MTDD). The MTDD is an Overlay Zone adopted by City ordinance and is part of the City's Municipal Code. Its purpose is "to provide supplemental development

2.0 Environmental Setting

regulations for property surrounding Mission Trails Regional Park. The intent of these regulations is to ensure that development along the edges of Mission Trails Regional Park enhances the park's natural qualities and promotes the aesthetic and functional quality of park/urbanization relationships, while recognizing the right to reasonable development within the Design District" (Municipal Code, Chapter 13 Zones, Article 2 Overlay Zones, Division 12 Mission Trails Design District, Section 132.1201 et seq.). To this end, the MTDD requires implementation of the supplemental design criteria and development standards contained in the Mission Trails Design Guidelines (MTDG) of the City's Land Development Manual. Compliance with the MTDD/MTDG would be ensured through processing of a SDP.

However, the MTDD clarifies where the Design District applies and states that "this overlay zone applies to those portions of the Navajo, Tierrasanta, and East Elliott communities that are within the boundaries shown on Map No.C-916" (Municipal Code, Section 132.1402). This map, additionally contained within the MTDG, shows three different subareas corresponding to differing design requirements. As shown in Figure 2-9 (a replica of Map No. C-916), the project site does not lie within any of the MTDD subareas. The project site lies approximately 4,500 feet south of the nearest Subarea 3. MTDD Subarea 3 encompasses areas along the San Diego River within Mission Gorge adjacent to Mission Trails Regional Park. Nonetheless, the proposed project generally conforms with the intent of the MTDD for Subarea 3 through incorporation of river-sensitive design features as described in Section 3.6 of this EIR.

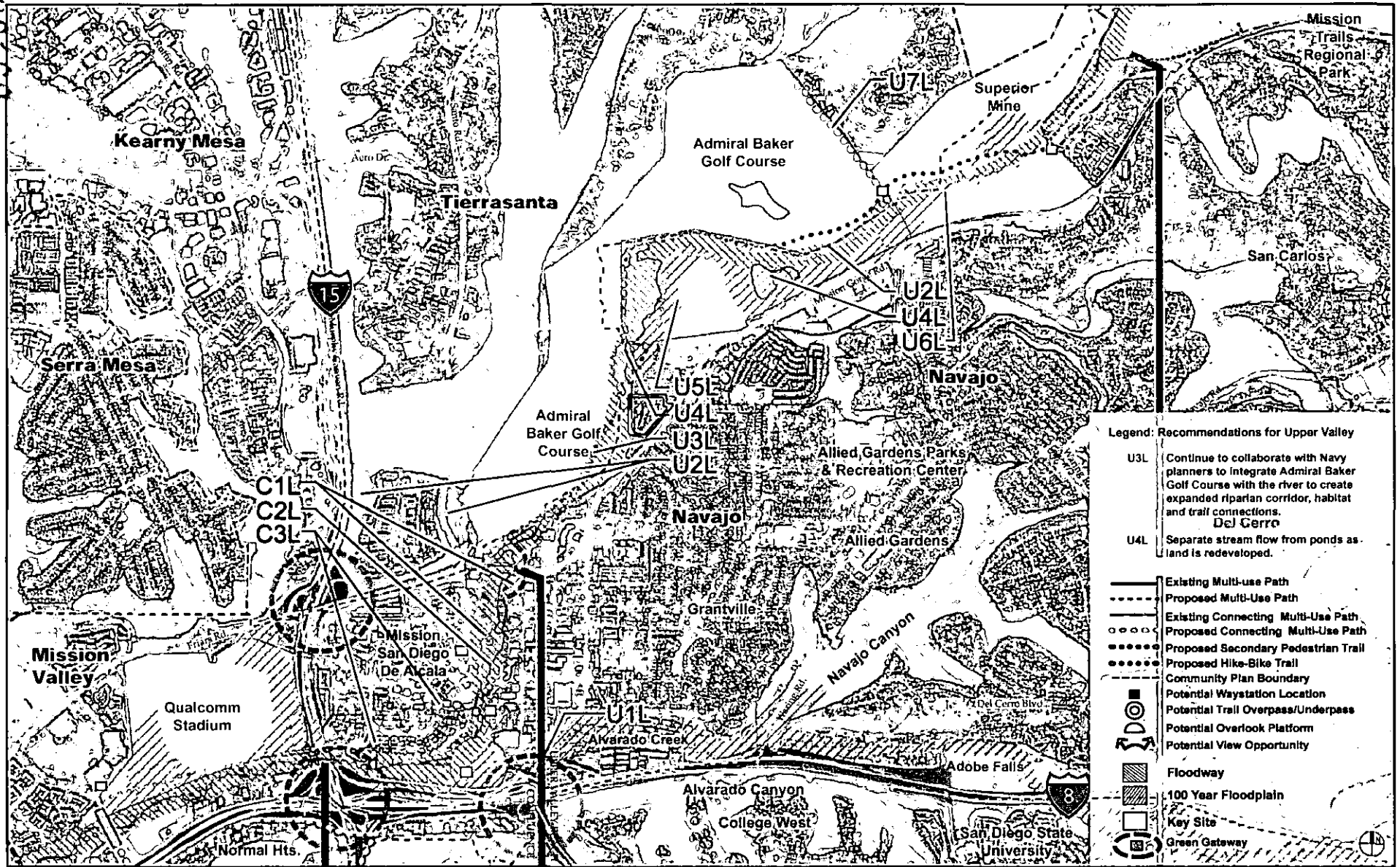
2.6.3 San Diego River Park Master Plan

The San Diego River Conservancy was established by an act of the California Legislature (AB 2156, Kehoe) to preserve, restore, and enhance the San Diego River Area. An important Conservancy goal is to build, in conjunction with partners, a River-long park and hiking trail stretching 52 miles from the River's headwaters near Julian to the Pacific Ocean. To help achieve this goal, the City of San Diego prepared the City of San Diego Master Plan for the San Diego River Park (SDRP). This Master Plan encompasses the river corridor from the City's boundary at Mission Trails regional Park to its westerly boundary at the Pacific Ocean. The project site is located within the river's Upper Valley reach as identified in the City of San Diego SDRP Master Plan as extending from Friars Road Bridge west to the eastern boundary of Mission Trails Regional Park (Figure 2-10).

2.6.3.1 SDRP Master Plan Principles

Through general and reach-specific recommendations, the SDRP Master Plan intends to provide a number of benefits, including:

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Project Boundary

FIGURE 2-10

San Diego River Park Draft Master Plan

- Cleanup and restoration of the hydrologic function of the San Diego River.
- Reclamation of the river corridor as a place that all San Diego residents and visitors come to, to enjoy the experience of nature.
- Unification of fragmented natural open space for use for both people and wildlife needs.
- Emphasize on a continuum of experience through protection of the various distinctive characters of each section of the river.
- Revelation of the valley history through its interpretation to the public.
- Reorientation of development toward the river.
- Creation of a synergy of people, water and wildlife to ensure a balance that best serves the needs of human, ecologic, hydrologic and economic demands of the river.

2.6.3.2 SDRP Master Plan General Recommendations

To achieve the recommendations of the City of San Diego SDRP Master Plan, development is generally recommended to incorporate the following hydrology, water quality, habitat and wildlife, recreation, cultural, and public art recommendations:

Hydrology and Water Quality

- Remove invasive vegetation species.
- Encourage the growth of appropriate native riparian and upland vegetation.
- Expand the river's recharge area.
- Adopt programs to reduce/remove non-point loads.

Habitat and Wildlife

- Establish desirable and appropriate corridor width objectives.
- Naturalize floodplain areas.
- Use biological systems to treat storm water before it enters the river.
- Encourage physical and visual access to the river wherever possible.

Recreation and Cultural Interpretation

- Create a connected, linear recreational system.
- Create connections from Ocean Beach to Santee.
- Create waystations.
- Create Multi-use Paths and Pedestrian Trails.

Public Art

- Create identity with art.
- Integrate art into the San Diego River Park experience.
- Include artists in design process.
- Make art accessible to everyone.

2.6.3.3 SDRP Master Plan Specific Reach Recommendations

Specific reach recommendations for the Upper Valley mirror the general recommendations and call for the establishment of a continuous open space and viable habitat corridor along the river. For development within the Upper Valley reach, consideration of establishing a continuous open space and viable habitat corridor that achieves wildlife movement and habitat objectives, identifying land appropriate for public accessibility and usability, improved interface between Admiral Baker Golf Course and river, exploration of opportunities to improve water quality and river pattern, and creation of sites at way stations to interpret the history of the valley settlement and the Old Mission Dam Flume are recommended.

Admiral Baker Golf Course is located west of and adjacent to the project site and is identified as one of three key sites within the Upper Valley reach with supplemental site-specific recommendations highlighting opportunities for integrating the golf course with the SDRP, expanding habitat area, and creating trail connections.

2.6.3.4 SDRP Master Plan Design Guidelines

Design Guidelines for the SDRP Master Plan contain recommendations for three corridor types. For the Upper Valley reach, a Habitat and Open Space Corridor with a minimum width of the existing floodway is recommended. This corridor is to include a Water Quality Buffer that filtrates surface runoff draining toward the River. For the Upper Valley reach, the Design Guidelines also recommend a 25-foot-wide Path Corridor outside of the Habitat and Open Space Corridor and an Open Space Corridor for Canyon Tributaries.

The Design Guidelines also establish trail widths and surface materials, trail furnishings and lighting, signage, and plant groups that include a Native Habitat Species List, a Buffer Species List, and an Urban Species List.

2.6.4 Grantville Redevelopment Plan

The proposed project site is not located within the Grantville Redevelopment Project Area, but lies immediately adjacent to it. The southern extent of Subarea B of the Grantville Redevelopment Project Area lies immediately adjacent to the project site on the north, and the northernmost finger of Subarea A lies immediately adjacent to the project site on the west. The Grantville Redevelopment Project Planned Land Use Map shows open space for the northernmost finger of Subarea A, which occurs immediately west of the project site. As identified in Section 3.6.3 of this EIR, through the project design incorporating a pedestrian and bicycle trail, vegetation screening, and other River- and MHPA-compatible design features, compatibility with this designated land use would be ensured.

Lands included in the redevelopment project area are largely confined to industrial and commercial properties experiencing blight or deteriorating conditions. The overall objective of the Grantville Redevelopment Plan is to eliminate and prevent blight and deterioration in the redevelopment plan area. Through collection of tax increment financing payments from new businesses within the redevelopment plan area, the City's Redevelopment Agency encourages broader investment in the redevelopment plan area by making public investments, providing incentives for private investments, and assembling properties suitable for new development at current standards. The proposed project would be compatible with these uses and would not preclude the success of the Redevelopment Plan.

2.6.5 Land Development Code (Municipal Code)

The City's Municipal Code contains all the adopted ordinances for the City and is divided into 15 chapters. Chapters 11 through 14 of the Municipal Code are known collectively as the Land Development Code (LDC). Chapters 13 (Zones) and 14 (General Regulations) are of particular relevance to development of the proposed project. Chapter 13, Zones, includes the applicable development regulations for the Base Zone of the project site, as well as supplemental development regulations contained within the applicable Overlay Zones. The relevant base and overlay zones are discussed further beginning with Section 2.6.5.1 below.

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, subdivision regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14 general regulations. Also included within the general regulations of Chapter 14 are the Inclusionary Affordable Housing Regulations and the Environmentally Sensitive Lands Regulations. Included within the supplemental development regulations of Chapter 14 are the Site Development Permit Regulations and the Mobilehome Park Discontinuance and Tenant Relocation Regulations. The inclusionary housing, environmentally sensitive lands, and mobile home park discontinuance regulations are discussed below beginning with Section 2.6.5.3. All other applicable land development regulations are discussed throughout this EIR, particularly in Sections 3.0 (Project Description) and 4.0 (Environmental Analysis).

2.6.5.1 Base Zone RM-3-7

The LDC Chapter 13, Zones, includes use and development regulations pertinent to the project site's underlying RM-3-7 base zone classification. In terms of use regulations, the RM-3-7 base zone permits multi-family residential use at a maximum density of one dwelling unit for each 1,000 square feet of lot area (Municipal Code, Section 131.0406). This would result in an allowed maximum of 445 dwelling units on the 10.22-acre project

2.0 Environmental Setting

site. The proposed project conforms to the use and density allowance of the RM-3-7 base zone by proposing a maximum of 444 multi-family dwellings.

LDC Chapter 13 also provides specific development regulations for RM-3-7 zones such as floor area ratio (FAR) requirements, height limit requirements, side-, front- and rear-yard setback requirements, retaining wall requirements, outdoor storage requirements, and so on.

As described in Section 3.0, Project Description, the project proposes uses consistent with overall FAR and other base zone development requirements, but is requesting a SDP to allow deviations from the requirements of the development regulations regarding structure height, retaining wall height, side yard setbacks, vehicular use area planting, and FAR for non-parking uses. The deviations from development regulations have been requested through a SDP and request for deviations form. (The consistency of the proposed project with the LDC is discussed further in Section 4.1 of this EIR.)

2.6.5.2 Overlay Zones

As described in Section 2.6.2 above, the project site is subject to the supplemental development requirements of two overlay zones, the MHPOZ and the CPIOZ.

a. Mobile Home Park Overlay Zone

The project site is overlain by the MHPOZ and thus subject to the requirements of LDC Chapter 13 Zones, Article 2 Overlay Zones, Division 7: Mobilehome Park Overlay Zone, Sections 132.0701 through 132.0705. The purpose of the MHPOZ is "to preserve existing mobile home park sites, consistent with the City's goal of accommodating alternative housing types, and to provide supplemental regulations for the discontinuance of mobilehome parks and the relocation of the mobile home park tenants" (Municipal Code, Section 132.0701). The permitted uses within the MHPOZ include mobile homes intended for use as single-unit dwellings and limited accessory uses such as recreation buildings, game courts, swimming pools, and other similar facilities intended only for the use of the tenants of the mobile home park and their guests.

The project applicant would comply with the procedures referenced in the MHPOZ for discontinuance of the existing mobile home park, in concert with the CPA to remove the MHPOZ from the project site. As stated in the MHPOZ regulations, any proposal to discontinue a mobile home park that is located within this zone is subject to the supplemental Mobilehome Park Discontinuance and Tenant Relocation Regulations contained in the Municipal Code, Sections 143.0610 to 143.0640, and requires a SDP.

As described in Section 3.0 of this EIR, the project proposes a SDP for discontinuance of the existing mobile home park and conversion to other uses. Section 2.6.5.5 below

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describes the Municipal Code regulations and state law applicable to this discontinuance process.

b. Community Plan Implementation Overlay Zone

The project site lies within the CPIOZ and is subject to its supplemental development regulations. As described above in Section 2.6.2.3, however, as stated in the Municipal Code, for "any development within the boundaries shown on a map identified in [Municipal Code] Section 132.1402, where the map shows "Type B", one must refer to the applicable community plan for supplemental development regulations, and process a Site Development Permit." The CPIOZ is thus more appropriately discussed above under the Navajo Community Plan, Section 2.6.2.3. The project design would be reviewed for consistency through processing of a SDP.

2.6.5.3 Inclusionary Affordable Housing Regulations

Included within the general regulations of the LDC's Chapter 14 are the Inclusionary Affordable Housing Regulations. Adopted by City ordinance in June 2003, the Inclusionary Affordable Housing Regulations purpose is "to encourage diverse and balanced neighborhoods with housing available for households of all income levels. The intent is to ensure that when developing the limited supply of developable land, housing opportunities for persons of all income levels are provided" (Municipal Code, Chapter 14, Article 2 Division 13, Section 142.1301). Applicable to the proposed project, the regulations require that "at least 10 percent (10%) of the total dwelling units in the proposed development shall be affordable to targeted rental households" (Municipal Code, Section 142.1306). *Proposed projects that meet the criteria of the regulations are allowed expedited project review under City Council Policy.*

According to the Inclusionary Affordable Housing Regulations, the requirement to provide 10 percent affordable dwelling units can be met in any of the following ways: (1) provide affordable units on the project site, (2) provide affordable units off-site, but within the same community planning area, (3) provide affordable units off-site and outside the community planning area, if a variance has been obtained, (4) pay an in lieu fee, or (5) any combination of the previous.

As described in Section 3.4.1 of this EIR, the proposed project would comply with the Inclusionary Affordable Housing Regulations by constructing 20 percent affordable units on-site in accordance with an agreement with the City Housing Commission.

2.6.5.4 Environmentally Sensitive Lands (ESL) Regulations

Also included within the general regulations of Chapter 14 is the Environmentally Sensitive Lands Regulations. On January 1, 2000, the ESL regulations were adopted by ordinance as a part of the LDC (Municipal Code) and replaced the 1998 Resource

Protection Ordinance (RPO). The purpose of the ESL regulations is “to protect and preserve environmentally sensitive lands and the viability of the species supported by those lands. The regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area” (Municipal Code, Chapter 14, Article 3: Supplemental Regulations, Division 1: Environmentally Sensitive Lands Regulations, Section 143.0101 et seq.).

The Archstone – Mission Gorge site is subject to the ESL Ordinance because it contains lands mapped as occurring within the 100-year floodplain of the San Diego River (refer to Figure 2-4). As described in Section 3.0 of this EIR, the project proposes a Site Development Permit, which is required for development on a premise containing ESL. Aside from the flood hazards (100-year floodplain) area on the western portion of the project site, no other ESL (e.g., sensitive biological resources, steep hillsides) occurs on-site. As described in Section 3.3 of this EIR, the proposed project design includes grading that would raise the finished pad elevation on the western portion of the site to a height above the 100-year floodplain, thus precluding the flood hazard issue.

2.6.5.5 Mobilehome Park Discontinuance and Tenant Relocation Regulations

The California Government Code (Section 65863.7) and the California Mobilehome Residency Law (Code of Civil Procedure, Section 798.55 et. seq.) together establish a comprehensive scheme regulating the procedures, notice provisions and mitigation measures required to close a mobile home park in California. Government Code Section 65863.7(e) specifies and limits the nature of mitigation measures that can be required by local agencies as a condition of approving a park closure.

Included within the LDC Chapter 14 supplemental development regulations are the Mobilehome Park Discontinuance and Tenant Relocation Regulations (see Municipal Code, Chapter 14, Article 3, Division 6, Section 143.0610 et seq.). “The purpose of these regulations is to set forth procedures for the conversion of an existing mobilehome park or spaces to another use. These regulations are intended to benefit the general public by minimizing the adverse impact on the housing supply and on displaced persons by providing certain rights and benefits to tenants and by requiring tenant relocation assistance whenever an existing mobilehome park or portion thereof is converted to another use” (Municipal Code, Section 143.0610). In accordance with these regulations, the project applicant is in the process of complying with the following procedures as repeated verbatim from Section 143.0630 of the regulations (refer also to Section 3.4.3 of this EIR, Mobile Home Park Closure):

- (a) Before the City issues any development permit or construction permit that would allow the use of any land that is currently used as a mobilehome park to be used for any other purpose, or to be converted

from mobilehome spaces to any other uses, a mobilehome park owner, lessee, or operator shall file an application to discontinue the mobilehome park or mobilehome spaces use.

(b) The application for discontinuance of a mobilehome park shall be processed as a Site Development Permit in accordance with Process Three which may only be granted if the decision maker makes the findings in Section 126.0504(k).

(c) The application for discontinuance of a mobilehome park shall be accompanied by a relocation plan which shall be transmitted to the San Diego Housing Commission or any successor agency for action. The relocation plan shall provide for the relocation of the tenants who will be displaced by the discontinuance of the use of the property as a mobilehome park or by the conversion of mobilehome spaces to other uses. The relocation plan shall comply with standards and regulations for relocation plans developed by the San Diego Housing Commission.

(d) The application for discontinuance of a mobilehome park shall not be approved until a relocation plan has been approved by the San Diego Housing Commission.

(e) Except as provided in Section 143.0630(f), the owner, lessee, or operator of a mobilehome park shall submit the required applications no later than 30 calendar days after the date on which one of the following occurs:

(1) Fifteen percent of the mobilehome spaces within the mobilehome park cease to be occupied by mobilehomes;

(2) Fifteen percent of the mobilehome spaces within the mobilehome park cease to be used for residential purposes if those mobilehomes are owned by the mobilehome park owner, lessee, or operator;

(3) The total of vacant mobilehome spaces and mobilehomes described in Section 143.0630(e)(2) equals 15 percent;

(4) A notice of determination that the mobilehome park is undergoing a change in use has been provided by the Executive Director of the San Diego Housing Commission.

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2.6.6 Multiple Species Conservation Program

The Multiple Species Conservation Program (MSCP) is a comprehensive program to preserve a network of habitat and open space in the region. In accordance with the MSCP, the City of San Diego adopted a Subarea Plan in March 1997 to implement the MSCP and habitat preserve system within the City limits. One of the primary objectives of the MSCP is to identify and maintain a preserve system which allows for animals and plants to exist at both the local and regional levels. Large blocks of native habitat having the ability to support a diversity of plant and animal life are known as "core biological resource areas." "Linkages" between these core areas provide for wildlife movement. To this end, the MSCP has identified a MHPA in which the permanent MSCP preserve will be assembled and managed. Within the MHPA, limited development may occur.

The Archstone – Mission Gorge project site lies within the City's MSCP Subarea but not within the City's MHPA. The project site does, however, lie approximately 30 feet east of the City's MHPA associated with the San Diego River. As outlined in Section 3.6 of this EIR, Environmental Design Considerations, the project has been designed to be a good neighbor to the San Diego River and adjacent MHPA, and would comply with the MHPA Land Use Adjacency Guidelines of Section 1.4.3 of the MSCP Subarea Plan. These guidelines are intended to ensure that edge effects associated with new development (i.e., drainage, toxins, grading, lighting, noise, barriers, and invasives) would not adversely impact adjacent MHPA lands.

2.7 Changing Trends

Trends which are changing the existing physical context of the area include planned development/redevelopment projects north of the project site and west of Mission Gorge Road to convert the industrial storage area immediately to the north (the Garver-Bradley project site) to high-density residential and the quarry site further to the north (the RiverPark project) to medium and high density residential and commercial uses. Currently there are two other plan amendments proposed in the Navajo community. The Alvarado Creek Plaza amendment is intended to redesignate 3.2 acres from Industrial to Mixed-Use, and the Grantville Redevelopment Project, as described above in Section 2.6.4, would redesignate and redevelop existing underused industrial areas to more intense commercial and light industrial uses. The City is additionally working on the Grantville Master Plan, which is associated with the Redevelopment Project Area. Table 7-1 in Section 7.0 of this EIR provides a summary list of recent and current development proposals within the vicinity. As indicated, all reflect an intensification of existing land use and integration of housing, employment, and transportation uses.