

DRAFT COMMENTS ON THE BALBOA AVENUE STATION AREA SPECIFIC PLAN

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Planning Area

We disagree with the drawn boundaries of the project area which were obviously drawn to specifically exclude Rose Creek. As Rose Creek is the primary natural feature in the area impacted by the project, its exclusion is especially troubling when the BASASP specifically relies on Rose Creek for multi-modal transportation options, providing open space, and connect the community to the transit station.

Climate Adaptation

Climate Resiliency Page 266 of PDF page 5.6-19

Strategy 5, Climate Resiliency, of the Climate Action Plan calls for further analysis of the resiliency issues that face the various areas of the City. Resiliency is addressed throughout the BASASP as it pertains to water usage, energy efficiency, and sustainable development practices as noted above. Also included within the BASASP are policies supporting and encouraging an increase in the tree canopy within the community to reduce summer heat temperatures, increase absorption of pollutants and carbon dioxide, and contribute to a more inviting atmosphere for pedestrians.

Protecting the wetlands is a key factor in climate resiliency . A healthy natural habitat in Rose Creek contributes to climate resiliency.

Natural Infrastructure for Coastal Adaptation to Sea Level Rise from <http://scc.ca.gov/climate-change/climate-ready-program/natural-infrastructure/>

We strongly urge the City of San Diego to identify natural strategies for climate adaptation that protect Rose Creek and the surrounding community and to incorporate these strategies into the community plan amendment.

Parks Deficiency

Item 5.13.1.3 Parks and Recreation

The General Plan standard for population-based parks is 2.8 useable acres per 1,000 residents, which can be achieved through a combination of neighborhood and community park acreages and park equivalencies. According to the City, a deficiency of approximately 80.91 acres exist in Pacific Beach while only 46.45 acres of population-based parkland exists in Pacific Beach..

Recommendations identified in item 5.13.3 require new parkland as the community is already deficient yet the plan does not propose additional parkland. We strongly disagree with this assessment and oppose any zoning density increase without additional parkland.

We have identified three types of Neighborhood Parks would be appropriate BASASP: “Neighborhood Park” “Mini Park” and “Pocket Park or Plaza”

We strongly recommend a pocket park at the old work center at the corner of Mission Bay Drive and Daemon Street with restroom facilities for people walking/jogging/biking the Rose Creek Bike Path and Bikeway and interpretative signs on the history of Rose Creek and the Kumayaay. The restroom facilities must be open to all people 24/7. This property is owned by the City of San Diego.

Page 364 “BASASP does not propose additional parkland. Thus, a deficit of parkland in the community would continue with buildout of the proposed project. The proposed project is not required to address the current or projected deficits. As such, payment of DIFs, collected at the time of building permit are issued for specific future development proposals, would offset the impacts of proposed development on parks and recreation facilities.”

We are strongly opposed to this strategy as these DIFs would not benefit the community that is being developed near the transit center. How can DIFs be redirected to projects in the Balboa Avenue Station Area Specific Plan? Adequate neighborhood parks are more important in high density zones than in R-1 zoning where families have backyards to play in. Without park improvements in the project area, residents and their pets will not have access to parks without driving to them. As the goal of this project is to create a transit oriented and walkable neighborhood, increasing density without increasing parkland is counter productive.

The plan does not include parkland dedication for Rose Creek nor does it include funding sources for Rose Creek from developer impact fees. While the Friends of Rose Creek understands the City is opposed to this change, the community is highly supportive of it and is willing to work with the City to identify sources of funding. Furthermore, Table 5.1-9 the Recreational Element, item RE-A.3 “Take advantage of recreational opportunities presented by the natural environment, in particular beach/ocean access and open space.” Without parkland dedication or some other management opportunity that maintains public ownership of the land and supports habitat restoration, water quality improvements, while insuring that adequate storm water can flow through the creek, this element will be hard to achieve. What are the strategies that the plan will use to incorporate item RE-A.3?

RE-A-6 requires the City to “pursue opportunities to develop population-based parks.” All the potential for population based parks exists along Rose Creek.

The primary opportunity is to designate Rose Creek as a population-based park. Further actions should be to acquire easements from property owners to create a children’s play area between the Rose Creek Bike Path and private property as well as benches for bird watching.

Biologic Resources

Item 5.3.5.1 Impacts

Impacts to Tier II and Tier IIIB could be mitigated by requiring easements for all development along Rose Creek to provide a buffer zone between the developed and the Tier II and Tier IIIB habitats. The buffer zone could be landscaped with appropriate native plants or suitable non-natives that are not invasive, drought tolerant and not on the The Cal-IPC Inventory (available at <https://www.cal-ipc.org/plants/inventory/>)

Restrict building heights to no more than 30 feet for properties boarding Rose Creek to allow sunlight to reach biologic habitats to prevent shadowing on the resources.

Item 5.3.4.3 Mitigation Framework

BIO-1 – If mitigation is required, mitigation should be done as close to the impacted site as is technically feasible and in no case should mitigation be done outside the Rose Creek Watershed. There are multiple

opportunities for Diegan Coastal Sage Scrub mitigation along Rose Creek between Grand Avenue and Mission Bay Drive.

Item 5.3.4 Issue 1 Sensitive Species 5.3.4.1 Impacts

Sensitive Plant Species

We appreciate the high level analysis of plant species that occur or could potentially occur in the project area. We disagree with the plan to allow project-level evaluations to occur without a full CEQA EIR process to occur (find exact verbage).. If implemented, this plan will allow CEQA requirements to be less rigoures (Find exact verbage) This results in a death by a thousand cuts to the biologic resources.

Sensitive Wildlife Species

We appreciate the high level analysis of wildlife species that occur or could potentially occur in the project area. However, we would like to point out a number of other species that currently hunt, fish, or next in the project area and that are species of concern due to Climate Change. While these species may not currently be endangered, .

As the State of California requires Climate Adaptation

The Western Osprey is listed as endanged on Audubon's climate designation impacts list and nests, fishes, and resides in the project area. It survives on fish in Rose Creek, the Kendall-Frost Marsh and Mission Bay Park. As Rose Creek is one of very few places for fish nurseries, it serves a critical component in the survival of this bird. While the Western Osprey is not endangered world wide, there are limited places within the City of San Diego where the Osprey nests, fishes and hangs out.

Item 5.3.8 Issue 5: Conservation Planning, 5.3.8.1 Impacts for MHPA Consistency. A MHPA Boundary Line Correction should only occur to accomodate the already built enviornment. Any new development should be precluded from implementation of a MHPA Boundary Line Connection.

MHPA Land Use Adjacency on Page 5.3-51. We strongly encourage that property easements and/or setbacks be required for parcels adjacent to Rose Creek and the Rose Creek Bike path as follows:

Items 5.3.6.4 Signifcant after Mitigation BIO-8 – We appreciate the emphasis on mitigation in close proximity to the impacts and within the same watershed.

Item 5.3.7.1 Impacts – Which specific protections, regulations, and/or designations apply to the designation of Rose Creek within the BASASP as “Open Space” under the City of San Diego General Plan Open Space Element? The current language in this section is vague and unclear. As all the land around Rose Creek is developed, the wetlands serve as the only wildlife corridor between Mission Bay Park and specifically the Kendall-Frost Reserve and the Rose Canyon and Marian Bear Open Space Parks.

Under the City of San Diego's General Plan Conservation Element, strategies must be implemented to address the Heat Island Urban Effect, protect open space, and adapt to climate change Elements: CE-A.2, CD-A.3, CE-A.12. How will the protection of Rose Creek serve to further these conservation element.

Section 5.3 Biological Resources Clairemont Mesa Community Plan

Clairemont Mesa is currently undergoing a Community Plan update and in as part of this plan update, is considering including the request for Rose Creek east of I-5 and south of Marian Bear Park to be identified as open space parks.

In table 5.3-5, Conservation Element- CE-B.1 identifies the pursuit of of formal dedication of existing open space areas (sub item f). What are the hurdles other than a lack of political will to pursued park designation or dedication for Rose Creek in the project area? Would the City of San Diego be willing to address parkland dedication if a maintenance assessment district or other permanent funding source was provided to address maintenance, habitat restoration, water quality improvements, and flood control protections.

In table 5.3-5, Conservation Element CE-C.1. Rose Creek downstream of Garnet Avenue is a coastal wetlands. Does the City of San Diego consider this section of Rose Creek subject to the mandate to protect, preserve, restore and enhance coastal wetlands? If yes, the PEIR should identify strategies and funding sources to take action on this mandate. If no, the PEIR should explain why Rose Creek downstream of Garnet Avenue is not an important coastal wetland and delineate the criteria used for such a designation.

In Section 5.3, page 5.3-31, under Litter/Trash and Materials storage, Priority 1, Item 1, indicates the City will provide and maintain trash cans and bins at trail access points as well as removing litter and trash on a regular basis. What is the timeline for implementation of and funding source for these trash cans? Please provide a more thorough explanation of what "remove litter and trash on a regular basis" means. Is that weekly, monthly, quarterly, annually or less frequently? How will the need to remove trash be identified by the responsible City departments?

In Section 5.3, page 5.3-31, under Litter/Trash and Materials storage, Priority 1, Item 4, identifies the requirement to keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement. How will the undercrossing be monitored to insure obstructions to wildlife movement are not occurring? Which department will be responsible for monitoring this and how frequently will it be monitored?

Section 5.3, Item 5.3.1.4 Wildlife Movement Corridors, In the final PEIR, please note that the City of San Diego has plans to restore the property currently occupied by Campland on the Bay to natural habitat which will make the linkages between Rose Creek and Kendall-Frost Reserve contiguous and encourage further wildlife movement in these areas. While outside the scope of this PEIR, the potential to enhance the wildlife corridor upstream of the BASASP remains and should this effort be undertaken separately, wildlife movement would be more feasible between Rose Canyon Open Space Park and Marian Bear Open Space Park in the north to lower Rose Creek in the BASASP planning area in the south and the wetlands habitats of Mission Bay Park

Under the City of San Diego Land Development Manualy (City 2012) Page 8, wetland buffers are required to protect the functions and values of the wetlands. In terms of buffers, we believe a natural and low maintenance buffer would consist of a hedgerow consisting of a mixture of native plant species that

provide habitat for small birds such as Lemonade Berry, Toyon, Sugar Bush (need biologic name). Please identify as one of the design elements that a native plants hedgerow is the preferred buffer for all future development on parcels adjacent to Rose Creek. For background on the benefits of using a hedgerow as a buffer, see <https://www.tenthacrefarm.com/2015/03/10-reasons-to-plant-a-hedgerow/>.

In section 5.3, on page 5.3-3, Diegan coastal sage scrub exists along the west side of Rose Creek south of Garnet and north of Grand Avenue in a short stretch. While technically outside the artificial boundaries of the BASASP, please include this habitat in the discussion of Diegan Coastal Sage Scrub in the area.

Mitigation Framework Item 5.3.5.3, BIO-6 Upland Habitats. Please identify the west bank of Rose Creek between Grand and Garnet Avenues as an area suitable for mitigation. The Friends of Rose Creek and the Nature School have been enhancing this area for over 20 years and there is still much area left to be restored. This area would be an appropriate mitigation site for impacts to the areas further away from Rose Creek and it would be appropriate to consolidate habitats into a contiguous corridor.

Page 310 of PDF – BENEFICIAL USES:

existing beneficial uses for Rose Creek: Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Warm Freshwater Habitat (WARM), and Wildlife Habitat (WILD). Industrial Service Supply (IND) is listed as a potential beneficial use for Rose Creek.

The following beneficial uses are designated in the Basin Plan for Mission Bay: IND; Navigation (NAV); REC-1; REC-2; Commercial and Sport Fishing (COMM); Preservation of Biological Habitats of Special Significance (BIOL); Estuarine Habitat (EST); WILD; Rare, Threatened, or Endangered Species (RARE); Marine Habitat (MAR); Migration of Aquatic Organisms (MIGR); Spawning, Reproduction and/or Early Development (SPWN); and Shellfish Harvesting (SHELL).

Transportation and Mobility

Page 5.1-19 – the plan to promote the establishment of Park And Ride facilities on or near East Mission Bay Drive is in direct opposition to the Village community this plan purpotes to achieve.

Mobility Element Policies Related to Multi-Modal Transportation Improvements, Table 5.1-7, ME-F.3 Identifies the goal to “Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.” However, without any dedicated funding stream there is no indication that the City will do an future maintenance as they currently do not perform any maintainence on the Rose Creek Bikepath.

Therefore, we recommend that the City identify a source of funding for maintenance of the existing Rose Creek Bike Path as well as the Rose Creek Bikeway currently under construction by SANDAG that will insure maintenance is performed annually at a minimum with more frequent maintenance preferred. If these trails are to be utilized by a wide cross section of the community, they must be safe, clean, and pleasant to use. Furthermore, any attempt to increase usage of this area must be accompanied by trash receptacles to reduce the amount of trash ending up in the creek.

Air Quality Impacts

Page 5-2.18 identifies the intersection of Garnet Avenue at Mission Bay Drive as a location of a Carbon Monoxide Hot Spot, yet this is the same intersection that users of the Trolley will be forced to traverse. This project needs to identify ways in which this health risk will be mitigated

Table : Table 5.6-7

COMPARISON OF ADOPTED COMMUNITY PLANS

VERSUS PROPOSED BASASP EMISSIONS (PDF Page 263) a significant increase in CO₂e “As shown in Table 5.6-7, the BASASP would result in an increase in GHG emissions of 28,627 MT CO₂e per year when compared to the emissions that would occur under the adopted Community Plans.”

Section 5.2.7.1 Impacts, Carbon Monoxide Hot Spots. While we understand that Table 5.2-7 shows the results of CO Modeling under the California Air Quality Limits identified in Table 5.2-2, we feel very strongly that reducing CO emissions and increasing plants and trees in a pedestrian friendly neighborhood is critical. Therefore, we would like to propose that a one foot wide , 3 foot tall hedgerow buffer be planted between the sidewalk and the street along Garnet Avenue to Soledad Mountain Road and along Mission Bay Drive/East Mission Bay Drive between the I-5 North on-ramp and the I-6 South on-ramp to use plant power to help lower CO emissions inhaled by pedestrians, provide a buffer between pedestrians and traffic, which should help improve walkability in the area.

According to the State of California, AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE prepared by the California Air Resources Board (available at <https://www.arb.ca.gov/ch/handbook.pdf>), identifies siting recommendations to protect the health of sensitive populations.

From the handbook:

“Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e.,

children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and **residential communities** (sensitive sites or sensitive land uses).” (Page 2 of Air Quality and Land Use Handbook)

The handbook recommends that residential uses be sited at least 500 feet away from Freeways and identifies the increased risk of developing cancer in sensitive populations ranges from 300 to 1,700 percent. The additional cost of medical expenses, life time loss of income, and death does not warrant siting residential homes in the area east of Del Rey Avenue or potentially even east of the alley between Del Rey and Revere avenue south of Balboa or within 500 feet of the freeway north of Balboa Avenue. These areas are better suited to commercial office space or clean and light industrial businesses and can provide jobs for people living in the area so they do not need to commute to Sorrento Valley by car.

Furthermore, we request that BASASP incorporate recommendations from The Bay Area Quality Air Management District 2016 guidebook “Planning Healthy Places: A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning” available at http://www.baaqmd.gov/~media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf?la=en, makes a number of best practices when it comes to siting sensitive uses such as residential developments that include:

- Plan sensitive land uses as far from local sources of air pollution such as freeways as is feasible.
- Consider incorporating solid barriers into site design, similar to a sound wall, between buildings and sources of air pollution (for example, a freeway).
- Plant dense rows of trees and other vegetation between sensitive land uses and emission source(s). Large, evergreen trees with long life spans work best in trapping air pollution, including: Pine, Cypress, Hybrid Poplar, and Redwoods.
- Consider limiting sensitive land uses on the ground floor units of buildings near non-elevated sources, e.g. ground level heavily traveled roadways and freeways.

We oppose the building of new residential units within 300 feet of Interstate 5 and within 150 of gas stations as outlined in the Bay Area Quality Air Management District Guidebook and believe that all of the above recommendations should be implemented to reduce exposure to freeway pollutants in residential areas.

Storm Water & MS4 permit

On April 7, 2015, the State Water Board adopted an Amendment to the Water Quality Control Plan for Ocean Waters of California (Ocean Plan) to Control Trash and Part 1 Trash Provision of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries (ISWEBE Plan). Together, they are collectively referred to as 'the Trash Amendments'.

TRASH shall not be present in inland surface waters, enclosed bays, estuaries, and along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.

MS4 permittees with regulatory authority over PRIORITY LAND USES shall be required to comply with the prohibition of discharge in Chapter IV.A.2.a herein by either of the following measures:

(1)

Track 1: Install, operate, and maintain FULL CAPTURE SYSTEMS for all storm drains that captures runoff from the PRIORITY LAND

USES in their jurisdictions; or

(2)

Track 2: Install, operate, and maintain any combination of FULL CAPTURE SYSTEMS, MULTI-BENEFIT PROJECTS, other TREATMENT CONTROLS, and/or INSTITUTIONAL CONTROLS within either the jurisdiction of the MS4 permittee or within the jurisdiction of the MS4 permittee and contiguous MS4 permittees. The MS4 permittee may determine the locations or land uses within its jurisdiction to implement any combination of controls. The MS4 permittee shall demonstrate that such combination achieves FULL CAPTURE SYSTEM EQUIVALENCY. The MS4 permittee may determine which controls to implement to achieve compliance with the FULL CAPTURE SYSTEM EQUIVALENCY. It is, however, the State Water Board's expectation that the MS4 permittee will elect to install FULL CAPTURE SYSTEMS where such installation is not cost-prohibitive.

The final Trash Amendments define priority land uses as land uses that are actually developed (i.e., not simply zoned) as high density residential, industrial, commercial, mixed urban, and public transportation stations⁴.

We argue that due to the transit zone proximity, the proposed high density development area, and the amount of trash that is currently being picked up by the Friends of Rose Creek (2 40-yard roll off dumpsters per year of trash) that this plan should include an implementation plan for trash reduction

Page 305 Section 5.8.5.1

FEMA 100-year Floodplains

Mapped 100-year floodplains within the BASASP area are limited to portions along Rose Creek, located west of I-5, east of Mission Bay Drive, and north of Damon Avenue. Because this area is proposed as permanent Flood Control/Open Space under the BASASP, no associated flood-related impacts would result from implementation of the proposed project.

303[d] List) include Rose Creek TMDLs are supposed to be created by 2021 (Page 310 of PDF) Bad levels of "selenium and toxicity."

On Page 5.9-1, The Storm Water Standards Manual, which was most recently updated in 2016, requires certain development projects classified as "Priority Development Projects" to include permanent post-construction BMPs in the project design. Will projects in the BASASP be considered "Priority Development Projects"? What permanent post-construction BMPs will be mandated for development projects?

Page 310 of PDF – BENEFICIAL USES:

Section 5.9, Hydrology, Water Quality, and Drainage on page 5.9-2 identifies the existing beneficial uses for Rose Creek: Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Warm Freshwater Habitat (WARM), and Wildlife Habitat (WILD). Industrial Service Supply (IND) is listed as a potential beneficial use for Rose Creek. How is the BASACP going to enhance the beneficial uses that have been degraded due to decades of City neglect?

The following beneficial uses are designated in the Basin Plan for Mission Bay: IND; Navigation (NAV); REC-1; REC-2; Commercial and Sport Fishing (COMM); Preservation of Biological Habitats of Special Significance (BIOL); Estuarine Habitat (EST); WILD; Rare, Threatened, or Endangered Species (RARE); Marine Habitat (MAR); Migration of Aquatic Organisms (MIGR); Spawning, Reproduction and/or Early Development (SPWN); and Shellfish Harvesting (SHELL).

The 303[d] List of impaired waterways includes Rose Creek While TMDLs are supposed to be created by 2021, how does the BASASP address high levels of selenium and toxicity or prevent their increase.

Zoning

Regarding Table 5.2-5 -- ADOPTED COMMUNITY PLANS AND PROPOSED
BASASP BUILDOUT LAND USES

We understand and support the high level goals of the City of Villages. However, we have specific concerns that are not being addressed. Land Use Element LU-A.8 indicates that the planning efforts should be determined “at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.” Therefore, we feel it is 100% appropriate for the BASASP to identify commercial use and other appropriate uses. To this end, public storage facilities do not contribute to a desirable neighborhood and should be removed from the zoning plan as this is the single largest land use in the area. Why was the footprint of public storage facilities maintained in a high transit area? How are public storage facilities utilized by transit with MTS limits the amount of belongings a person is allowed to transport via public transit?

Residential services such as a grocery store and pharmacy should be explicitly included in the plan. We also feel that a health club is an important community benefit and we need to maintain a health club facility in this project area. What types of uses are allowable in Arterial Commercial zoning and how does this zoning differ from the current zoning plan? Please define the allowable uses in the PEIR so that the community can make informed decisions.

Visitor Accommodations currently exist in the BASASP area and are critically important given the proximity to Mission Bay Park and the east of access to the beach. The accommodations in this area are affordable to a wide range of incomes and provide accommodations not available at similar price points in Pacific Beach. We feel that any downzoning of these businesses would limit visitor access to the coastal zone. Furthermore, as these businesses will be in the Transit Priority Zone, visitors to San Diego will not need a vehicle to access them from the intercity train station, bus depot, and/or airport. Furthermore, they will be able to visit many of San Diego's tourist attractions without need a car. Zoning for these need to remain.

Walkable Neighborhoods

In Item 5.6.2.3 Regional San Diego Association of Government's San Diego Forward: The Regional Plan goals are to

- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- **Preserve open space, natural beauty, and critical environmental areas.**

Unfortunately, the BASASP falls short on these goals. .

In Section 5.15, Table 5.15-1 identifies on Garnet Avenue, that Mission Bay Drive to I-5 NB Off Ramp has sidewalks, curb, and gutter on both sides and a raised median. This is not true. Large stretches of this

section do not have sidewalks and no raised median exists between the intersection of Mission Bay Drive/Garnet Avenue North to the intersection of Mission Bay Drive/Damon Avenue. No sidewalks exist north of Damon Avenue. This table also identifies that Mission Bay Drive between Bluffside and Rosewood have a raised median. No raised median exists between the intersection of Damon Avenue/Mission Bay Drive south to Mission Bay Drive/Garnet Avenue.

While the plan identifies traffic degrading further and indicates no mitigation is possible, the pedestrian/bicycle bridge is a significant opportunity for mitigation. By reducing pedestrian/bicycle traffic at the Mission Bay Drive/Garnet Avenue intersection and by allowing non-motorized modes of travel to avoid this intersection, users of the Balboa Avenue Transit center will be able to avoid the traffic queuing at this critical intersection and other intersection identified in the draft PEIR.

Housing Affordability

Low Income Housing must be a required component of the plan. Has a survey of the income levels of the people living in the Pacific Beach portion of the plan been conducted and if so what are the results of that survey and how does the new zoning propose to accommodate at least the number of low and medium income rental units that currently exist? Please insure that future housing will comprise an equal or greater number of units as currently exist for low income housing. (Page 5.1-8) City Policy LU-H.1

Ethnohistoric Heritage

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The entire BASASP area west of I-5 is within the mapped area of P-37-005017 (CA-SDI-5017; SDM-W-150/152), the ethnohistoric village of La Rinconada de Jamo (or Rinconada). This is a large and significant archaeological site that has been subject to vast disturbance over many years of ranching, road construction, and residential and commercial development. The village was called Rinconada (Spanish for “corner”) by Gaspár de Portolá and his party in July 1769. Mission records give the Spanish names of Rincon and Rinconada for the village, as well as the Kumeyaay names Jamio, Japmo, and Jamo

Archaeological site P-37-005017 (CA-SDI-005017) meets eligibility Criterion (d) of the National Register of Historic Places (NRHP) because previous research has demonstrated that the site has yielded, and has the potential to yield important and significant information about the region’s history and prehistory. The site also contains important California Indian values, as it was occupied for approximately 3,000 years up to the time of Spanish settlement in the area. Based on these evaluations, P-37-005017 is a significant cultural resource under CEQA and the City’s Historical

Resources Guidelines. Though in a disturbed and developed area, midden deposits with human remains and associated artifacts such as shellfish remains, ground stone, flaked stone, shell and bone ornaments have been discovered.

Due to these issues, we feel very strongly that within a buffer zone along Rose Creek, interpretative signage should include ethnohistory of the Kumeyaay people who occupied this area along with appropriately designed art work, preferably by Kumeyaay artists to highlight the rich history of this part of Pacific Beach. This would help encourage businesses along the creek to orient toward the creek by situating cafes and restaurants with outdoor patios overlooking the creek.

Sesimic Analysis

Section 5.9, Hydrology, Water Quality, and Drainage under the section NPDES Groundwater Permit

While studies have indicated that Ground water at is hit at depts ranging from 2 to 24 feet as most of this area is the historic Rose Creek flood plan, how do Page 315 of PDF

Earthquake – high liquification

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“The majority of the BASASP area is underlain by hydraulically placed fills, which are classified as having a high liquefaction potential (Geologic Hazard Category 31) in the City Seismic Safety Study (City 2008a). Young alluvial deposits mapped within portions of Rose Canyon have a low liquefaction potential (Category 32). Young colluvial deposits and old alluvial deposits, and localized areas of old paralic deposits may exhibit moderate to high liquefaction potential.” Soil materials associated with the San Diego Formation, Scripps Formation

Can't read Legend for figure Figure 5.5-2.

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“bodies of water such as lakes or reservoirs, and are most typically associated with seismic activity. Seiches can result in flooding damage and related effects (e.g., erosion) in surrounding areas from spilling or sloshing water, as well as increasing pressure on containment structures. The BASASP area is located approximately two miles inland from the Pacific Ocean and approximately 0.25 mile northeast of Mission Bay. Therefore, the area is not likely to be inundated due to tsunami or seiche. Furthermore, the BASASP area is not located within a mapped tsunami inundation area based on the State of California Tsunami Inundation Map for Emergency Planning La Jolla Quadrangle (2009).”

My 2 cents – the Japanese Tsunami went two miles up river.

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The California Seismic Hazards Mapping Act (PRC; Division 2, Chapter 7.8, Section 2690 et seq.) to require the completion and review of appropriate geotechnical studies prior to approving development projects. These requirements are implemented on a local level through means such as general plan directives and regulatory ordinances (with applicable local standards outlined below).

Page 241 of PDF outlines what needs to be done to build in this area for earthquake and specifically liquefaction.

My 2 Cents: With all the additional costs of addressing seismic activity, how do we create affordable housing at in the study area?