



DELANO & DELANO

April 6, 2020

VIA E-MAIL

Jeffrey Peterson, Development Project Manager
City of San Diego
Development Services Department
1222 First Ave.
San Diego, CA 92101

Re: Trails at Carmel Mountain Ranch (Project No. 652519): Notice of Preparation

Dear City of San Diego:

This letter is submitted on behalf of Carmel Mountain Ranch Community Residential Association in connection with the proposed 164.5-acre, 1,200 multi-family residential unit Trails at Carmel Mountain Ranch (“Project”) and associated proposed amendments to the City of San Diego (“City”) General Plan and Carmel Mountain Ranch Community Plan (“Community Plan”). The EIR should address the following issues:

- The scope of the Project;
- All phases of Project development, including related developments in the area;
- Air quality impacts, including short-term construction impacts related to construction-related trips, dust, project phasing, and long-term operational impacts;
- Biological resource impacts, including impacts to any sensitive biological resources, wildlife, habitat, or environmentally sensitive lands;
- The Project’s consistency with, among other things, the General Plan’s Conservation Element and the Community Plan’s Community Environment, Conservation & Design Element;
- Construction traffic impacts, including impacts associated with slow-moving and heavy equipment;
- Energy impacts, including impacts related to estimated energy use and reduction of inefficient, wasteful, or unnecessary energy consumption;
- Geologic impacts, including impacts related to soil and geologic conditions associated with the Project;
- Hydrology impacts, including impacts related to drainage conditions of the Site;
- Land use impacts, including existing General Plan and Community Plan requirements and existing uses in the surrounding area;

EVERETT L. DELANO III
Admitted in California and Colorado

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Admitted in California and New York

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Admitted in California and Hawaii

- The Project's consistency with the applicable land use plans including, the General Plan and Community Plan;
- Community character impacts, including existing and surrounding landforms and uses;
- The Project's consistency with, among other things, community character and/or community theme provisions of the General Plan's Urban Design Element and the Community Plan's Community Environment, Conservation and Design Element;
- Traffic impacts, including impacts associated with inducing travel;
- The Project's consistency with, among other things, the General Plan's Mobility Element and the Community Plan's Transportation Element;
- Noise impacts, including construction-related noise;
- Noise impacts to surrounding uses, including nearby neighborhoods, parks and habitat uses, and impacts associated with destruction of on-site vegetation;
- The Project's consistency with, among other things, the General Plan's Noise Element and Community Plan provisions concerning noise attenuation;
- Light impacts to surrounding uses, including nearby neighborhoods, parks and habitat uses;
- Public services and facilities impact, including impacts to police, fire-rescue, libraries, and school services, and parks and recreations facilities;
- Public utilities impact, including impacts associated with increased waste management needs;
- The Project's consistency with, among other things, the General Plan's Public Facilities, Services & Safety Element and Recreation Element and the Community Plan's Public Facilities and Services Element, School Element, and Parks and Open Space Element;
- Toxics and human health impacts, including impacts associated with construction and airborne contamination during construction and impacts associated with exiting soil and water contamination;
- Water quality impacts, including impacts associated with existing on-site and groundwater contamination;
- Water supply impacts;
- Historical and cultural resource impacts, including impacts to archaeological resources and tribal cultural resources;
- The Project's consistency with, among other things, the General Plan's Historic Preservation Element and the Community Plan's Cultural Resources Element;
- Cumulative impacts;
- Climate Change impacts, including the Project's consistency with the City's Climate Action Plan;
- Adequate and verifiable mitigation for Project impacts;

- Consideration of mitigation that includes open space protection in and around the Project site; and
- An adequate range of alternatives, including an alternative that protects biological resources, reduces traffic impacts and related air quality and climate change impacts and a “no project” alternative that is consistent with existing uses and existing conditions in the Project vicinity.

Please contact me if you have questions or need additional information. Additionally, please ensure I am provided a copy of the draft EIR and any notice regarding the Project. Thank you for your consideration of the above.

Sincerely,



Everett DeLano