

Proposed Noise Attenuation Wall

April 9, 1985

MEMORANDUM FOR: Benjamin R. Bobo, Manager, Los Angeles Field Office, 9.4S

ATTENTION: Herbert L. Roberts, CPD Division Director, 9.4C

FROM: Alfred C. Moran, Assistant Secretary, Community Planning and Development, C

**SUBJECT: Program Benefit, County of San Diego
(City of Poway), Proposed Noise Attenuation Wall**

This is in response to your memorandum of March 28, 1985 transmitting documentation regarding a proposal by the County of San Diego to construct a 6,800 foot noise attenuation wall in a non-low and moderate income area in the City of Poway, and requesting our review and advice.

Based on the information presented in your memo and the accompanying documents, we find that construction of the proposed noise attenuation will not meet any of the three broad national objectives of the Community Development Block Grant (CDBG) program. Thus, it does not appear fundable under this program.

The City of Poway considers the area in which the noise attenuation wall is to be built blighted, and believes that the project is eligible for funding as an activity "to prevent or eliminate slums or blight." The City's identification of the east side of Pomerado Road as blighted appears to be based on three conditions: the area is subject to flooding from a "seriously undersized" flood control channel; noise (reaching 75 dBa CNEL) is significantly above the city's noise standard for single family residential areas and is a blighting influence on the area; and, the curbs, gutters and sidewalks along Pomerado Road have experienced deterioration.

Section 570.208(b)(1)(ii) of the CDBG program regulations requires that in order for an area to qualify as slum or blighted it must contain "a substantial number of deteriorating or dilapidated buildings or improvements throughout the area." The City of Poway seeks to meet this requirement based on the alleged deterioration of curbs, gutters and sidewalks along only one road: Pomerado Road. This does not constitute an adequate identification of a slum or blighted area. Further, based on the report of your on-site inspection, the properties by which this road passes do not appear to exhibit evidence of deterioration. In fact, you report that the condition of properties in the area east of Pomerado Road are maintained in good repair. Thus, the "area" is not slum or blighted, but merely contains a road which has need of some curb, gutter, and sidewalk repairs.

That the City of Poway identifies potential flooding and current noise levels as additional justification to identify this area as slum or blighted does not help. Instead it serves to call attention to the fact that the area affected by the flood potential and the area affected by current noise patterns are much larger than the area represented by the deteriorated roadside improvements cited.

Thus, we conclude that the City of Poway and our grantee, the County of San Diego, have failed to identify a slum or blighted area, and this proposed activity does not meet the requirements for funding under the CDBG program.