



Date of Notice: July 19, 2021

## **PUBLIC NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING PLANNING DEPARTMENT**

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**PUBLIC NOTICE:** The City of San Diego (City) as the Lead Agency has determined that the project described below will require the preparation of a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a PEIR and Scoping Meeting was publicly noticed and distributed on July 19, 2021. This notice was published in the San Diego Daily Transcript and placed on the City's Planning Department website at: <https://www.sandiego.gov/planning/programs/ceqa> and on the City's CEQA website at: <https://www.sandiego.gov/ceqa/meetings>.

**SCOPING MEETING:** The City of San Diego Planning Department will hold a public scoping meeting on **Thursday, August 5, 2021, from 12:00 PM to 2:00 PM** online via Zoom. **Please note that depending on the number of attendees, the meeting could end earlier than 2:00 PM.** The public scoping meeting can be accessed at <https://zoom.us>. Go to "Join a Meeting." Meeting ID: **919 9980 7310** Passcode: **428838**. To access the webinar via phone, please call **(408) 638-0968** and enter the meeting information.

Written comments regarding the proposed PEIR's scope and alternatives can be sent to the following address: Rebecca Malone, Senior Environmental Planner, City of San Diego Planning Department, 9485 Aero Drive, MS 413, San Diego, CA 92123. You may also e-mail your comments to [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov) with the project name in the subject line. All comments must be received no later than **August 18, 2021**. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A PEIR incorporating public input will then be prepared and distributed for public review and comment.

**PROJECT NAME:** Blueprint San Diego  
**COMMUNITY PLAN AREA:** Citywide  
**COUNCIL DISTRICT:** All

**PROJECT DESCRIPTION:** The General Plan provides a policy framework for land use decisions in the City that balance the needs of a growing City. It expresses a Citywide vision and provides a comprehensive policy framework for how the City should develop, provide public services, and maintain and enhance the qualities that define the City of San Diego. Community plans work together with the General Plan to provide location-based policies and recommendations in the City's 50 community plan areas.

The General Plan and Community Plans play a critical role in meeting the City's Climate Action Plan goals and contributing to the region's mobility vision and needs, by identifying land uses and public improvements that work toward achieving the Citywide mobility mode share targets that reflect quantified greenhouse gas emissions. As the City and State have shifted away from

accommodating additional vehicular travel, to instead focus on reducing vehicular travel through strategic land use planning – primarily by locating new development near transit – and investments in walking, bicycling, and transit improvements, proactive and comprehensive land use planning is more critical than ever.

Community Plans serve as a framework for the future development of the City communities over a 20 to 30 year timeframe. Community plans are written to refine the General Plan’s Citywide policies and implement the Climate Action Plan, to designate land uses, plan for complete mobility networks, and provide additional site-specific recommendations as needed. They provide more detailed land use designations and site-specific policies on a wide array of topics including housing, mobility, open space and parks, public facilities, sustainable development, environmental justice, urban design, and historic preservation. Together, the General Plan and the community plans guide future development to achieve Citywide policy objectives in line with the CAP for more sustainable housing and mobility to prioritize reduction in greenhouse gas emissions.

The City updates community plans to provide policy direction that reflects the current vision and needs of the City and community. An updated community plan can catalyze both public and private investment and opportunity in a community through new housing, job growth, infrastructure, and public spaces to ensure that our neighborhoods thrive in a way that furthers the City’s attainment of the Climate Action Plan goals.

Community plan updates provide land use maps and designations to address housing and employment needs and to target the connection between our residents and jobs to reduce vehicle miles traveled through safe and efficient mobility options. They establish new and updated policies that address community or neighborhood-specific issues consistent with the General Plan and identify new and improved public facilities and infrastructure needed to serve local and citywide residents and visitors. Community plan updates may also contain community-specific supplemental development regulations, zoning amendments, urban design policies, and other measures to implement the updated Community Plan.

Blueprint San Diego is a new approach to comprehensive Citywide planning that will proactively identify the City’s housing, climate, and mobility goals and implement them throughout the City at the community plan level in a way that reflects the unique characteristics of each community. This approach will provide a Citywide framework to guide and focus future land use changes in each community, in a manner that is fundamentally consistent with the City’s climate, infrastructure, and environmental goals, as well as the Citywide housing allocation determined by the state-mandated Regional Housing Needs Assessment Plan. This approach will provide an equitable framework for future development throughout the City that advances the City’s environmental justice goals.

Blueprint San Diego will establish land use and mobility thresholds to identify appropriate land uses in areas near and within future and existing Transit Priority Areas. A fundamental objective of Blueprint San Diego will be to further the Climate Action Plan by establishing a framework for strategic land use planning that will achieve the City’s greenhouse gas emissions reductions targets through reduced Citywide vehicle miles traveled. Blueprint San Diego will also identify objective design standards to ensure future development is compatible with the City’s identity and vision expressed in the General Plan and community plans.

These data-driven thresholds will be used to guide future Community plan updates and other implementation actions. It is anticipated that Blueprint San Diego will involve General Plan and community plan amendments, San Diego Municipal Code amendments, zoning changes, and other implementation actions to achieve its desired outcomes.

The project has received funding from the State of California's Local Early Action Planning grant and is intended to accelerate housing production in the City to address the City's housing goals and to create plans to more quickly implement the mobility infrastructure to meet the housing and employment needs and reduce the citywide greenhouse gas emissions in line with the City's CAP. These changes will allow for greater and more tailored public engagement to best inform the needs of our communities and ensure public engagement is representative of the demographics of the community.

While the Blueprint San Diego program will be used to guide future community plan updates, the program also immediately includes the current ongoing comprehensive updates to the Mira Mesa and University Community Plans, and amendment to the Uptown Community Plan for the Hillcrest Focused Plan area.

### **Land Use and Mobility Thresholds for Future Community Plan Updates**

Blueprint San Diego will identify minimum housing and employment intensities for areas near and within future and existing Transit Priority Areas throughout the City. These thresholds will identify the levels of development necessary to further the citywide transportation mode share goals of the Climate Action Plan for walking, bicycling, and transit. Transit Priority Areas are defined in State law as an area within one-half mile of a major transit stop that is existing or planned for in a regional transportation plan. It is anticipated that these thresholds would be used to guide future community plan updates to identify the land uses and intensities to implement Blueprint San Diego.

### **Objective Design Standards to Plan for Our Neighborhoods**

To address the State's housing shortage, recent State legislation requires using objective and quantifiable standards to review and approve multiple-unit housing development. Objective Standards are regulations that do not require a subjective judgment or hearing to determine that a project satisfies the applicable regulatory requirements. Blueprint San Diego includes the establishment of additional objective standards to ensure that future development is compatibly designed and developed in a manner that results in positive investments within our communities.

### **Mira Mesa Community Plan Update**

The Mira Mesa Community Plan was adopted in 1992. The General Plan identifies Mira Mesa as a regional employment center. The Mira Mesa Community Plan Update will address housing and employment growth by identifying mixed-use villages within commercial centers along Mira Mesa Boulevard within the central and eastern portion of the community, Sorrento Mesa employment center within the western portion of the community, and the business park area within the eastern portion of the Miramar employment center. The villages areas will provide for additional housing, public spaces, multi-modal circulation improvements, and parks. The mixed-use villages are primarily located within Transit Priority Areas. The Mira Mesa Community Plan Update will also identify trails within open space areas. It will also contain recommendations for improving bicycle and pedestrian facilities and transit access consistent with SANDAG's Regional Plan.

### **University Community Plan Update**

The University Community Plan was adopted in 1987. The General Plan identifies the community as a regional employment center. The University Community Plan Update will address housing and employment growth by identifying areas for higher residential density and employment intensity within areas near light rail transit stations that are under construction. The University Community Plan Update will also provide urban design policies and supplemental development regulations to improve the pedestrian environment within mixed use and employment areas. The University Community Plan Update identifies village areas for additional housing and public space/parks within existing commercial centers within the southern and northern portions of the

community. The mixed-use villages and areas near the light rail transit stations are primarily within Transit Priority Areas. The University Community Plan Update will also identify trails within open space areas and designate additional City owned property as open space. It will also contain recommendations for improving bicycle and pedestrian facilities and transit access consistent with SANDAG's Regional Plan.

#### **Uptown Community Plan Focused Plan Amendment**

The Uptown Community Plan was adopted in 2016. The Focused Plan Amendment to the Uptown Community Plan for the Hillcrest area is within multiple Transit Priority Areas. The Focused Plan Amendment will address housing and employment growth by identifying areas for higher residential density and employment intensity within areas primarily along University Avenue, Washington Street, Fourth, Fifth and Sixth avenues. The Focused Plan Amendment will also provide urban design policies, multi-modal circulation improvements, and supplemental development regulations to improve the pedestrian and bicycle networks. The Focused Plan Amendment will identify areas for additional housing and public space/parks. It will also contain recommendations for improving bicycle and pedestrian facilities and transit access consistent with SANDAG's Regional Plan.

#### **PROJECT LOCATION:**

#### **Land Use and Mobility Thresholds and Objective Design Standards**

All activities associated with implementation of the minimum housing and employment intensities thresholds and objective design standards would be located within the City's geographic jurisdiction. The City of San Diego land area covers nearly 372 square miles and is in the southwestern corner of California, within the County of San Diego. Figure 1 shows the City of San Diego boundary as well as the City's current Transit Priority Areas. It is anticipated that a majority of future population growth would occur within and near existing and future Transit Priority Areas.

#### **Mira Mesa Community Plan Update**

Mira Mesa is accessible from Interstate 805 (I-805) and Interstate 15 (I-15). The Mira Mesa Community Plan planning area is generally bounded on the north by Los Peñasquitos Canyon, on the west by I-805, on the east by I-15, and on the south by Miramar Road. The community planning area is approximately 10,729 acres. Figure 1 shows the plan area boundaries. Mira Mesa is bordered by Marine Corps Air Station (MCAS) Miramar to the south; University and Torrey Pines community plan area to the west; Los Peñasquitos Canyon open space area to the north, and Miramar Ranch North and Scripps Miramar Ranch community plan areas to the east.

#### **University Community Plan Update**

University is accessible from I-5, I-805, and State Route 52 (SR-52), and will be served by the Mid-Coast Blue Line Trolley, which will connect University to Downtown San Diego and the citywide transit network. The University Community Plan planning area is generally bounded by SR-52 on the south, I-805 on the east, and I-5 and the Pacific Ocean on the west, encompassing an area of approximately 8,676 acres. Figure 1 shows the plan area boundaries. University is bordered by: Clairemont Mesa community plan area to the south; MCAS Miramar, Mira Mesa community plan area, and Torrey Pines community plan area to the east; and La Jolla community plan area to the west.

#### **Hillcrest Focused Plan Amendment**

The Hillcrest Focused Plan Amendment area is located at the center of the Uptown Community Plan area and SR-163 splits the area, as shown in Figure 1. The Focused Plan Amendment area encompasses central sections of the Hillcrest Medical Complex neighborhoods. It is bounded by a series of streets and canyons, including Park Boulevard to the east, Walnut Avenue to the south,

Dove Street to the west, and hilltop bluffs along the northern edge of the Medical Complex neighborhood.

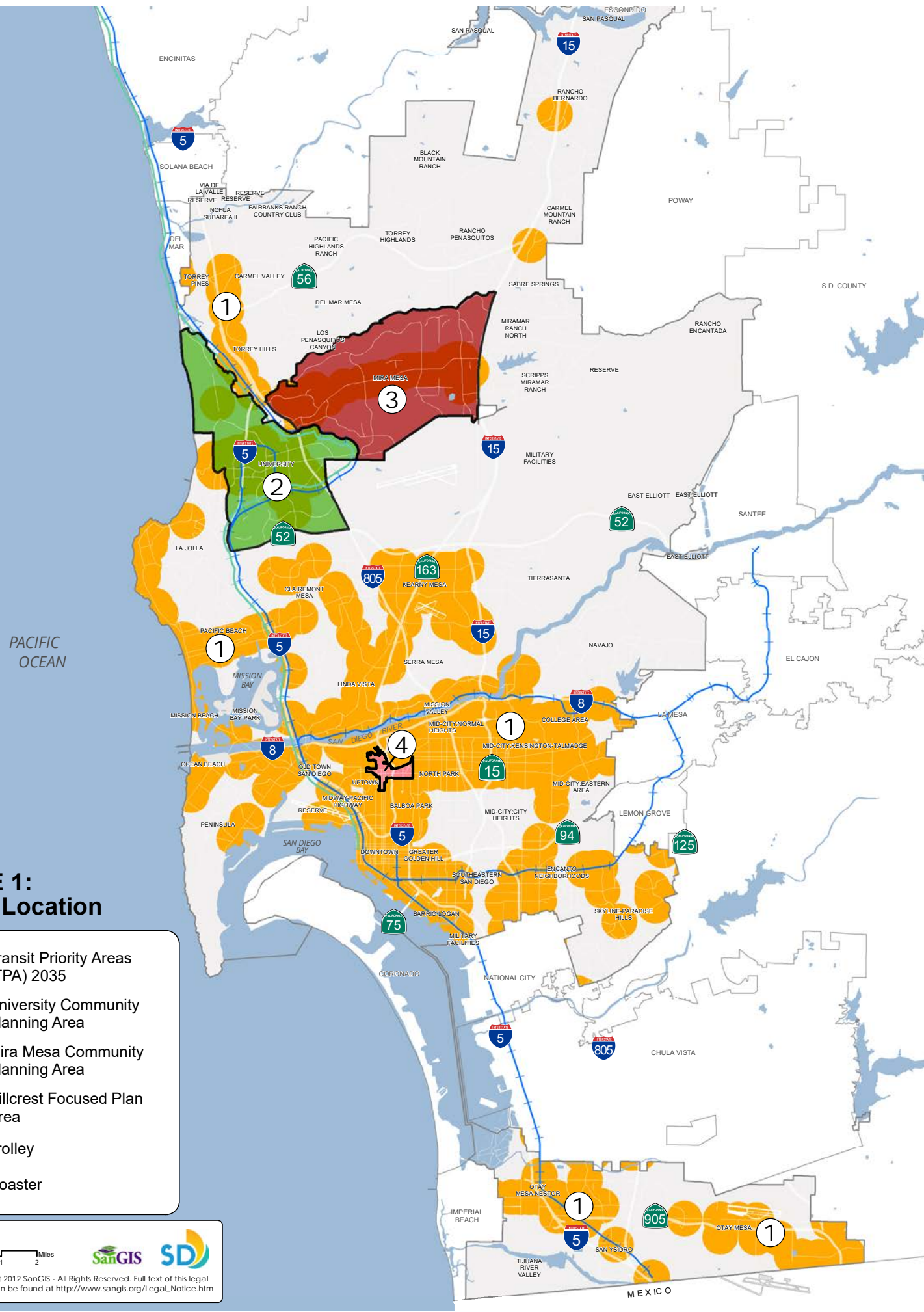
**RECOMMENDED FINDING:** Pursuant to CEQA Guidelines Section 15060(d), the proposed project and other related implementing actions may result in significant environmental impacts in the following areas: Aesthetic/Visual Effects, Air Quality, Biological Resources, Energy Conservation, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Historical Resources (Built-Environment, Archaeology, and Tribal Cultural Resources), Hydrology and Water Quality, Land Use, Noise, Paleontological Resources, Population and Housing, Public Services and Facilities, Public Utilities, Transportation/Circulation, Wildfire, and Cumulative Effects.

**AVAILABILITY IN ALTERNATIVE FORMAT:** To request this Notice in alternative format, please call the Planning Department at (619) 235-5200 OR (800) 735-2929 (TEXT TELEPHONE).






**ADDITIONAL INFORMATION:** For information regarding the project and any public meetings/hearings, please contact Rebecca Malone at (619) 446-5371. Please also visit <https://www.sandiego.gov/blueprints> for updated information. This Notice was published in the San Diego Daily Transcript and distributed on July 19, 2021.

Heidi Vonblum  
Deputy Director  
Planning Department

**ATTACHMENT:**  
Figure 1 – Project Location



**FIGURE 1:  
Project Location**

-  Transit Priority Areas (TPA) 2035
-  University Community Planning Area
-  Mira Mesa Community Planning Area
-  Hillcrest Focused Plan Area
-  Trolley
-  Coaster





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## **DISTRIBUTION LIST:**

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U.S. Dept of Transportation (2)  
U.S. Dept. of Housing & Urban Development (7)  
U.S. Environmental Protection Agency (19)  
U.S. Fish and Wildlife Service (23)  
U.S. Army Corps of Engineers (26)

### **State of California**

Caltrans District 11 (31)  
California Dept. of Fish & Wildlife (32)  
Housing & Community Dev Dept (38)  
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California Coastal Commission (47)  
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California Transportation Commission (51)  
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Native American Heritage Commission (56)  
Office of Planning and Research (57)  
California Environmental Protection Agency (37A)  
State Clearinghouse/Delicia Wynn (46A)  
California Dept of Transportation (51A)  
California Dept of Transportation (51B)

### **County of San Diego**

Air Pollution Control District (65)  
Planning and Land Use (68)  
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Library Department-Gov. Documents (81)  
Central Library (81A)  
Balboa Branch Library (81B)  
Beckwourth Branch Library (81C)  
Benjamin Branch Library (81D)  
Carmel Mountain Ranch Branch (81E)  
Carmel Valley Ranch Branch (81F)  
City Heights/Weingart Branch Library (81G)  
Clairemont Branch Library (81H)  
College-Rolando Branch Library (81I)  
Kensington-Normal Heights Branch Library (81K)  
La Jolla/Riford Branch Library (81L)  
Linda Vista Branch Library (81M)  
Logan Heights Branch Library (81N)  
Malcolm X Library & Performing Arts Center (81O)  
Mira Mesa Branch Library (81P)  
Mission Hills Branch Library (81Q)



Mission Valley Branch Library (81R)  
North Clairemont Branch Library (81S)  
North Park Branch Library (81T)  
Oak Park Branch Library (81U)  
Ocean Beach Branch Library (81V)  
Otay Mesa-Nestor Branch Library (81W)  
Pacific Beach/Taylor Branch Library (81X)  
Paradise Hills Branch Library (81Y)  
Point Loma/Hervey Branch Library (81Z)  
Rancho Bernardo Branch Library (81AA)  
Rancho Penasquitos Branch Library (81BB)  
READ/San Diego (81CC)  
San Carlos Branch Library (81DD)  
San Ysidro Branch Library (81EE)  
Scripps Miramar Rancho Branch Library (81FF)  
Serra Mesa Branch Library (81GG)  
Skyline Hills Branch Library (81HH)  
Terrasanta Branch Library (81II)  
University Community Branch Library (81JJ)  
North University Branch Library (81JJJ)  
University Heights Branch Library (81KK)  
Malcolm A. Love Library (457)

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Historical Resources Board (87)  
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**Other Governments**

City of Chula Vista (94)  
City of Coronado (95)  
City of Del Mar (96)  
City of El Cajon (97)  
City of Escondido (98)  
City of Imperial Beach (99)  
City of La Mesa (100)  
City of Lemon Grove (101)  
City of National City (102)  
City of Poway (103)  
City of Santee (104)  
City of Solana Beach (105)  
San Diego Association of Governments (108)  
San Diego Unified Port District (109)  
San Diego County Regional Airport Authority (110)  
Metropolitan Transit System (112)  
San Diego Gas & Electric (114)  
Metropolitan Transit System (115)  
San Dieguito River Park JPA (116)

**School Districts**

Chula Vista School District  
Del Mar Union School District  
Grossmont Union High School District

La Mesa–Spring Valley School District  
Lemon Grove School District  
National School District  
Poway Unified School District  
San Dieguito Union High School District  
San Ysidro School District  
Santee School District  
Solana Beach School District  
South Bay Unified School District  
Sweetwater Union High School District  
San Diego Unified School District  
San Diego Unified School District, Paul Garcia  
San Diego Community College District

**Community Planning Groups**

Community Planning Committee (194)  
Balboa Park Committee (226A)  
Black Mountain Ranch–Subarea I (226C)  
Otay Mesa–Nestor Planning Committee (228)  
Otay Mesa Planning Committee (235)  
Barrio Logan Planning Group (240)  
Downtown Community Planning Council (243)  
Clairemont Mesa Planning Committee (248)  
Greater Golden Hill Planning Committee (259)  
Serra Mesa Planning Committee (263A)  
Kearney Mesa Community Planning Group (265)  
Linda Vista Community Planning Committee (267)  
La Jolla Community Planning Association (275)  
City Heights Area Planning Committee (287)  
Kensington–Talmadge Planning Committee (290)  
Normal Heights Community Planning Committee (291)  
Eastern Area Planning Committee (302)  
Midway/Pacific Highway Community Planning Group (307)  
Mira Mesa Community Planning Committee (310)  
Mission Beach Precise Planning Board (325)  
Mission Valley Planning Group (331)  
Navajo Community Planners, Inc. (336)  
Carmel Valley Community Planning Board (350)  
Del Mar Mesa Community Planning Board (361)  
North Park Planning Committee (363)  
Ocean Beach Planning Board (367)  
Old Town Community Planning Board (368)  
Pacific Beach Community Planning Committee (375)  
Pacific Highlands Ranch–Subarea III (377A)  
Rancho Peñasquitos Planning Board (380)  
Peninsula Community Planning Board (390)  
Rancho Bernardo Community Planning Board (400)  
Sabre Springs Community Planning Group (406B)  
San Pasqual–Lake Hodges Planning Group (426)  
San Ysidro Planning and Development Group (433)  
Scripps Miramar Ranch Planning Group (437)  
Miramar Ranch North Planning Committee (439)

Skyline Paradise Hills Planning Committee (443)  
Torrey Hills Community Planning Board (444A)  
Southeastern San Diego Planning Committee (449)  
Encanto Neighborhoods Community Planning Group (449A)  
College Area Community Planning Board (456)  
Tierrasanta Community Council (462)  
Torrey Highlands – Subarea IV (467)  
Torrey Pines Community Planning Board (469)  
University City Community Planning Group (480)  
Uptown Planners (498)

### **Town and Community Councils**

Town Council Presidents Association (197)  
Barrio Station, Inc. (241)  
Downtown Community Council (243)  
Harborview Community Council (245)  
Clairemont Town Council (257)  
Serra Mesa Community Council (264)  
La Jolla Town Council (273)  
Rolando Community Council (288)  
Oak Park Community Council (298)  
Darnell Community Council (306)  
Mission Beach Town Council (326)  
San Carlos Area Council (338)  
Carmel Mountain Ranch Community Council (344)  
Pacific Beach Town Council (374)  
Rancho Peñasquitos Town Council (383)  
Rancho Bernardo Community Council, Inc. (398)  
San Dieguito Planning Group (412)  
United Border Community Town Council (434)  
Murphy Canyon Community Council (463)  
Mission Valley Community Council (328C)  
Ocean Beach Town Council, Inc. (367A)

### **Native American**

Native American Heritage Commission  
Kuumeyaay Cultural Heritage Preservation (223)  
Kuumeyaay Cultural Repatriation Committee (225)  
Barona Group of Capitan Grande Band of Mission Indians (225A)  
Campo Band of Mission Indians (225B)  
Ewiiapaayp Band of Mission Indians (225C)  
Inaja Band of Mission Indians (225D)  
Jamul Indian Village (225E)  
La Posta Band of Mission Indians (225F)  
Manzanita Band of Mission Indians (225G)  
Sycuan Band of Mission Indians (225H)  
Viejas Group of Capitan Grande Band of Mission Indians (225I)  
Mesa Grande Band of Mission Indians (225J)  
San Pasqual Band of Mission Indians (225K)  
Ipai Nation of Santa Ysabel (225L)  
La Jolla Band of Mission Indians (225M)  
Pala Band of Mission Indians (225N)

Pauma Band of Mission Indians (225O)  
Pechanga Band of Mission Indians (225P)  
Rincon Band of Luiseno Indians (225Q)  
San Luis Rey Band of Luiseno Indians (225R)  
Los Coyotes Band of Mission Indians (225S)

**Other Interested Agencies, Organizations and Individuals**

Daily Transcript (135)  
San Diego County Apartment Association (152)  
San Diego Chamber of Commerce (157)  
Building Industry Association (158)  
San Diego River Park Foundation (163)  
San Diego River Coalition (164)  
Sierra Club San Diego Chapter (165)  
San Diego Natural History Museum (166)  
San Diego Audubon Society (167)  
San Diego River Conservancy (168)  
Environmental Health Coalition (169)  
California Native Plant Society, San Diego Chapter (170)  
San Diego Coastkeeper, Matt O'Malley (173)  
Citizens Coordinate for Century 3 (179)  
Endangered Habitat League (182)  
Citizens Coordinate for Century 3 (189)  
League of Women Voters (192)  
National City Chamber of Commerce (200)  
Carmen Lucas (206)  
South Coastal Information Center (210)  
San Diego Historical Society (211)  
San Diego Archaeological Center (212)  
Save Our Heritage Organization (214)  
Ron Chrisman (215)  
Frank Brown - Inter-Tribal Cultural Resource Council (216)  
Campo Band of Mission Indians (217)  
San Diego County Archaeological Society Inc. (218)  
San Diego Canyonlands (165A)  
Jim Peugh (167A)  
Endangered Habitat League (182A)  
Clint Linton (215B)  
Alliance of Californians for Community Empowerment  
Alliance san Diego  
Allied Gardens/Grantville Community Council  
Bayside community center  
Bayview Community Development Corporation  
Casa Familiar  
Castle Neighborhood Association  
Catholic Charities San Diego  
Center on Policy Initiatives  
Chelsea Investment Corp  
Circulate SD  
City Heights Community Development Corporation  
Climate Action Campaign  
Community Housing Works

Community organizer  
County of SD Dept of Housing and Community Development  
CSA SD County  
EDC  
Environmental Health Coalition  
Episcopal Community Services  
Father Joe's Villages  
Grow San Diego  
Housing the next 1 million  
Housing You Matters  
Interfaith Shelter Network  
Jewish Family Services San Diego  
Legal Aid Society of SD  
LGBT Center  
Local Initiatives Support Corporation  
London Moeder Advisors  
MAAC Project  
Malick Infill Development  
Mexican American Business & Professional Association  
Mid-City CAN  
Nile Sisters Development Initiative  
Park to Bay - Designer  
PATH San Diego  
Point Loma Nazarine University  
Rick Engineering  
San Diego Air Pollution Control District  
San Diego Housing Federation  
San Diego Organizing Project  
SD building and construction trades council  
SD Community Land Trust  
SD County Building Trades Council Family Housing Corporation  
SD Regional EDC  
SD Urban Land Institute  
San Diego Housing Commission  
SDSU  
South County EDC  
Southern California Rental Housing Association  
St Paul's Senior Services  
The American Legion  
The Chicano Federation  
The San Diego Foundation  
UCSD Planning  
Urban Collaborative Project  
USD Real Estate  
YIMBY Democrats

## Stacey Higgins

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**From:** Lisa Madsen <Lisa.Madsen@sandag.org>  
**Sent:** Wednesday, August 18, 2021 1:54 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Blueprint San Diego

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Good afternoon,

The San Diego Association of Governments (SANDAG) appreciates the City of San Diego's efforts provide public notice for the preparation of a Program Environmental Impact Report (PEIR) for the Blueprint San Diego project.

We look forward to supporting the City of San Diego in realizing the benefits of the proposed project as part of SANDAG's 2021 Regional Plan/5 Big Moves. When available, please send any additional documents related to this project to me. SANDAG appreciates the ability to comment on this project. If you have any questions, please do not hesitate to contact me directly.

Thank you,  
Lisa

Lisa Madsen (she/her/hers)  
Senior Regional Planner

(619) 595-1432  
401 B Street, Suite 800, San Diego, CA 92101

**SANDAG**



**SANDAG** hours: Tuesday-Friday and [every other Monday](#) from 8 a.m.-5 p.m.  
*Employees are teleworking while our offices are closed during the COVID-19 pandemic.*

## Stacey Higgins

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**From:** Frank Landis <franklandis03@yahoo.com>  
**Sent:** Wednesday, August 18, 2021 2:49 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] CNPSSD Response to Blueprint San Diego Notice of Preparation  
**Attachments:** CNPSSD comments on Blueprint San Diego NOP 20210818.pdf

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Dear Ms. Malone,

Please find attached the CNPSSD response to the Blueprint San Diego NOP. Please let me know whether you received this document and can open the attachment.

There is one item that needs to be dealt with immediately. Does the BSD include Los Peñasquitos Canyon or not?

Since the Mira Mesa Planning Board considers Los Peñasquitos Canyon to be part of their planning area, this is a non-trivial issue. If the BSD does include Los Peñasquitos Canyon, then there is an immediate CEQA problem: Not all parties affected by this NOP were notified. Worse, the timing of the announcement, published July 19, 2021, with comments due August 18, 2021, makes it impossible for many of them to respond, as they do not have August meetings.

Please clarify the boundaries of the BSD immediately, and if necessary, extend the deadline for comments on the NOP to October 1, 2021 if the BSD does include Los Peñasquitos Canyon. Denying people impacted by a project the ability to voice their concerns is certainly problematic. After all, the point of a NOP is to gather information to assess and ideally avoid impacts.

If Los Peñasquitos Canyon is covered by the BSD, then the following actions must be taken:

First, Ms. Malone or a representative of City Planning should present this project to the Los Peñasquitos Canyon Preserve Citizen's Advisory Committee (LPCPCAC), which next meets Thursday, September 16, 2021 at 7:00 pm online. The author of this letter (Frank Landis) is the chair of the LPCPCAC and will be happy to distribute documents and set up the meeting. The LPCPCAC is where all the groups that have an interest in Peñasquitos Canyon, including planning boards, environmental and archeological groups, city and county rangers, bicycling and equestrian groups, and the interested public meet and work out issues. There is no better group to get project feedback from, due to the diversity of interests. The LPCPCAC should be copied on all BSD documents hereafter.

Second, Planning Boards from three other communities (Rancho Peñasquitos, Del Mar Mesa, and Carmel Valley) also consider Peñasquitos Canyon to be part of their community areas for planning purposes. They need to be informed that their interests are at stake, as it was not at all obvious in the NOP that this was the case.

Third, County Parks and City Stormwater all need to receive this NOP and to be given time to respond.

- County Parks is currently designing a bridge on their land in Peñasquitos Canyon, and they are not designing it for commuters.

- City Stormwater uses the western end of Peñasquitos Canyon as a major mitigation bank, where they create wetland patches to mitigate for wetland vegetation lost in maintaining the City's stormwater system.

All of these steps need to be part of this process.

Note that the attachment contains considerably more than the above paragraph. Please insure that all four pages can be read and are part of the EIR record.

Sincerely,

Frank Landis, PhD  
Conservation Chair, CNPSSD



# California Native Plant Society

San Diego Chapter of the California Native Plant Society  
P O Box 121390  
San Diego CA 92112-1390  
conservation@cnpssd.org | www.cnpssd.org

August 18, 2021

Rebecca Malone  
Senior Environmental Planner  
City of San Diego Planning  
Department, 9485 Aero Drive,  
MS 413, San Diego, CA 92123.  
By email to: PlanningCEQA@sandiego.gov

RE: Blueprint San Diego Notice of Preparation

Dear Ms. Malone and all,

Thank you for the opportunity to comment on the the Blueprint San Diego (“BSD”) Notice of Preparation (“NOP”). The San Diego Chapter of the California Native Plant Society (CNPS) promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on California's native plants, the vegetation they form, and climate change as it affects both.

We are troubled by the phrases “The Mira Mesa Community Plan Update will also identify trails within open space areas” and “The University Community Plan Update will also identify trails within open space areas.” These are especially problematic when matched with “The Mira Mesa Community Plan planning area is generally bounded on the north by Los Peñasquitos Canyon.”

**Does the BSD include Los Peñasquitos Canyon or not? Why does the BSD include City open space areas when these are explicitly covered by the just-passed Parks Master Plan?**

Since the Mira Mesa Planning Board considers Los Peñasquitos Canyon to be part of their planning area, this is a non-trivial issue. If the BSD does include Los Peñasquitos Canyon, then there is an immediate CEQA problem: Not all parties affected by this NOP were notified. Worse, the timing of the announcement, published July 19, 2021, with comments due August 18, 2021, makes it impossible for many of them to respond, as they do not have August meetings.

Please clarify the boundaries of the BSD immediately, and if necessary, extend the deadline for comments on the NOP to October 1, 2021 if If the BSD does include Los Peñasquitos Canyon. Denying people impacted by a project the ability to voice their concerns is certainly problematic. After all, the point of a NOP is to gather information to assess and ideally avoid impacts.

If Los Peñasquitos Canyon is covered by the BSD, then the following actions must be taken:



*Dedicated to the preservation of California native flora*

First, Ms. Malone or a representative of City Planning should present this project to the Los Peñasquitos Canyon Preserve Citizen's Advisory Committee (LPCPCAC), which next meets Thursday, September 16, 2021 at 7:00 pm online. The author of this letter (Frank Landis) is the chair of the LPCPCAC and will be happy to distribute documents and set up the meeting. The LPCPCAC is where all the groups that have an interest in Peñasquitos Canyon, including planning boards, environmental and archeological groups, city and county rangers, bicycling and equestrian groups, and the interested public meet and work out issues. There is no better group to get project feedback from, due to the diversity of interests. The LPCPCAC should be copied on all BSD documents hereafter.

Second, Planning Boards from three other communities (Rancho Peñasquitos, Del Mar Mesa, and Carmel Valley) also consider Peñasquitos Canyon to be part of their community areas for planning purposes. They need to be informed that their interests are at stake, as it was not at all obvious in the NOP that this was the case.

Third, County Parks and City Stormwater all need to receive this NOP and to be given time to respond.

- County Parks is currently designing a bridge on their land in Peñasquitos Canyon, and they are not designing it for commuters.
- City Stormwater uses the western end of Peñasquitos Canyon as a major mitigation bank, where they create wetland patches to mitigate for wetland vegetation lost in maintaining the City's stormwater system.

All of these steps need to be part of this process.

The rest of the comments assume that the BSD covers open space parkland, that it will interfere with or replace the Parks Master Plan, the yet-to-be-written Trails Master Plan, and will be completed before the City's review of its actions under the Multiple Species Conservation Plan (MSCP).

There are two issues that are critical. One is that there are no unused open spaces in San Diego County. Open space parks are not areas set aside for future development. Instead, they are overused and underfunded lands that are bound both by legal agreements and by environmental hazards.

The second thing to realize is that the CEQA process is designed ideally to avoid problems. Some City planners have expressed the notion that planning and design get done, with things like trails drawn in the blank space on maps which represent the Open Space parks. Then someone else "does the CEQA" afterwards. "Doing CEQA" after the planning is largely complete seems a recipe for extended and needless conflict. Every consultant and environmental group recommends doing CEQA differently:

- First, as an initial checklist during early project design. This is done to find issues, *so that problems can be avoided by proper planning*,
- Second, to consult with affected parties (NOP, scoping meetings, informal contacts), to find anything that was missed. This often turns up issues that can be fixed with a minor redesign.
- Finally, through researching and writing the EIR, to analyze impact avoidance, and if necessary, to deal with unavoidable impacts.

CNPSSD does get involved in CEQA conflicts that involve native plants, but we actually get involved in a tiny minority of the CEQA projects that are completed within the county. One big reason for this is that many CEQA consultants actively work to use the CEQA process to avoid impacts and thereby to avoid expensive conflict and litigation. If the CEQA process is followed correctly, there is rarely any reason for environmental groups to engage. The projects we get most heavily involved in uniformly fail to follow CEQA.

Therefore, we strongly urge City Planning to use the CEQA process correctly on the BSD. Make sure all affected parties are notified, give us all time to respond, and incorporate our feedback into

planning before writing the Programmatic EIR for this project. The most useful comments will be about infrastructure and programmatic problems that do not seem to have been considered in the NOP.

The MSCP is not a hurdle, it is a legal agreement between many parties, including the State of California, the US Federal government, and the City and County of San Diego. It is a combined Habitat Conservation Plan/Natural Communities Conservation Plan. Among other things, it allows the City to comply with Federal and State Endangered Species Act requirements for a list of species. This should be the ground on which city planning is based, especially in MSCP lands.

According to the San Diego Natural History Museum, San Diego City parks host over 700 native plant species in total, 93 of which are sensitive or listed. That is roughly on par with the flora of the entire Everglades, in a much smaller space, with far more people in the open space and exponentially less protection. The MSCP *does not* cover all 93 sensitive plant species, but it does provide an umbrella of conservation. San Diego County is currently the most biodiverse county in the United States. However, if open space is heedlessly paved and developed, San Diego will soon become known as the Extinction Capital of the United States, and that reputation will be permanent.

Rose Canyon and Los Peñasquitos Canyon contain two of the larger areas of trees sequestering carbon on city land. Since these are a critical and limited resource, projects that threaten them conflict with the City Climate Action Plan. The main threat, incidentally, is fire from increased traffic and battery fires, not from clearing for bike paths.

Another issue is that both Rose Canyon and Peñasquitos Canyon have land use issues that make them problematic for any additional development. Specifically:

- Both have steep slopes. Paths going from Mira Mesa or UTC would go down these slopes.
- Some paths (for instance from Camino Ruiz to the bottom of Peñasquitos) pass through sensitive plant vegetation communities (coastal sage scrub, maritime chaparral) and sensitive plant species (Nuttall's scrub oak, *Quercus dumosa* CRPR List 1.B). There is no place to mitigate for significant impacts to these, because the canyons were set aside to protect them in the first place, and some areas actually are mitigation banks for projects outside the canyons.
- Both canyons are Very High Fire Hazard Zones, which may involve fire, fire insurance, and definitely involves CEQA interactions between wildfires and post-fire erosion from steep slopes. Fire damage and erosion will likely close any bike path in these canyons for an extended time.
- The western end of Peñasquitos Canyon is in the Coastal Zone, so this PEIR will go before the Coastal Commission.
- Peñasquitos Creek has flooded up to 12 feet above baseline in the last decade. Normally, trails throughout the canyon are closed after anything more than 1/2" of rain, due to flooding and the Peñasquitos clay being slippery and highly erodible. After long experience and many repair and rebuilding efforts, Parks Department bridges across Peñasquitos Creek are now designed to break away in floods, so that they can be easily retrieved and reinstalled once the water goes down. County Parks may be following a similar design in their portion of Peñasquitos Canyon. Peñasquitos Canyon is, to put it bluntly, a lousy commuter route during normal or wet winters.

During the rest of the year, mixing commuters with thousands of people trying to hike or walk, ride horses, or walk with their children and/or dogs is a recipe for trouble. During 2020, when beaches were closed, park visitation increased by at least 25 percent. It has not subsided. Will bike paths displace these people? Or will they be expected to mix? And what about all the native plants at the edges of existing trails? How will the City mitigate damage to plants that are supposed to be conserved?

Given that maintenance is now done partly with volunteers as the result of systematic underfunding of parks, who will maintain a commuter bike trail throughout the year? We do not recall seeing this in the Parks Master Plan. Will the land be transferred to some other division? During the

City Council hearings, Councilmembers expressed great concern about the chronic underfunding of maintenance in all parks throughout the City. How much more will Blueprint San Diego require them to do?

With regard to climate change, there are two critical issues. One issue is fire, as one wind-driven wildfire through a canyon will send that part of the City's sequestered carbon back into the air. Since basically all wildfires in the coastal zone are anthropogenic, minimizing ignition possibilities seems to be the best way to ameliorate risk. Putting large numbers of electric bikes next to dry shrubs, and combining this with highly ignitable weeds along the bike path verge, is a recipe for fire. Clearing in the MHPA is highly problematic, and it will also conflict in part with Stormwater's efforts to create wetlands right up to the trail edges. How will this be managed?

As the County is working out in their decarbonization framework, maintaining and rebuilding infrastructure in itself emits carbon. This can present a dilemma. In Peñasquitos, an all-weather bike path will have to be paved, but maintenance and rebuilding around erosion will require continued emissions so long as the path is used. This is also true for maintaining bridges. Conversely, keeping the bike path in dirt means that it will be seasonally impassable, and wood bridges will need to be replaced more frequently, due to their more limited capacity. Making such a system carbon neutral for the life of the project, as required by the state of California's 2035 limit, will not be easy.

While we do not have solutions to all of this, the process for starting to resolve them begins by obtaining input from all the parties that are affected by this project. To that end, we strongly advocate extending the deadline on the NOP to October 1, so that everyone who has dealt with trail, bridge, wildlife, bike, horse, restoration, mitigation, and community issues has a chance to discuss it and see what we can add.

Finally, we believe that the BSD planning process is funded by a 2020 Local Early Action Planning (LEAP) Grant from the California Department of Housing and Community Development. Is this the case? If so, the April 30, 2020 staff report to City Council, for the resolution authorizing the City to apply for the grant and accept, appropriate and expend the funds, made no mention of trails in open space. The recently approved Parks Master Plan has committed the City to a process for trails planning that includes a future Trails Master Plan, with City staff agreement to conduct a thorough MSCP review as a first step in developing that plan. All mention of trails should be removed from the Blueprint San Diego PEIR.

Thank you for taking these comments. I hope that they are useful. Please keep me informed about the project at both my emails: [conservation@cnpssd.org](mailto:conservation@cnpssd.org) AND [franklandis03@yahoo.com](mailto:franklandis03@yahoo.com). Feel free to contact me with any questions or comments, or to set up a meeting.

Stay safe,



Frank Landis, PhD

Conservation Chair

California Native Plant Society, San Diego Chapter



## NATIVE AMERICAN HERITAGE COMMISSION

July 22, 2021

Rebecca Malone  
City of San Diego  
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San Diego, CA 92123

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**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
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[NAHC.ca.gov](http://NAHC.ca.gov)

**Re: 2021070359, Blueprint San Diego Project, San Diego County**

Dear Ms. Malone:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse



## Stacey Higgins

---

**From:** Madison Coleman <madison@climateactioncampaign.org>  
**Sent:** Tuesday, August 17, 2021 12:45 PM  
**To:** PLN\_PlanningCEQA  
**Cc:** Wilde, Randy; Lawrence, Jessica; Bailey, Brittany; Matthew Vasilakis; Maleeka Marsden; Noah Harris  
**Subject:** [EXTERNAL] CAC Blueprint San Diego Recommendation Letter  
**Attachments:** Blueprint SD Proposed PEIR Letter.pdf

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

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Dear Planning Department,

On behalf of Climate Action Campaign, please accept this letter with our recommendations for Blueprint San Diego.

We look forward to engaging with you on this important project.

Thank you.

**Madison Coleman** (she/her)  
Policy Advocate  
*Climate Action Campaign*  
[3900 Cleveland Ave, Suite 208](#)  
[San Diego, CA 92103](#)  
(619)419-1222 ext. #711

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[Facebook.com/ClimateActionCampaign](https://www.facebook.com/ClimateActionCampaign)

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*Our Mission is Simple: Stop the Climate Crisis*



August 17, 2021

City of San Diego  
Planning Department  
9485 Aero Drive, M.S. 413  
San Diego, CA 92123  
Via Email: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

**Subject: Climate Action Campaign recommendations for the Blueprint San Diego Proposed Program Environmental Impact Report (PEIR)**

Dear Rebecca Malone and Planning Department,

Climate Action Campaign (CAC) is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

CAC has been at the frontlines of fighting for Community Plan Updates (CPU's) that couple climate strategies and specific plans to provide abundant affordable housing near world class transit, and create bikeable, walkable neighborhoods powered with 100% clean energy. Since our founding, we have advocated for the exact strategic land use and transit priority areas (TPAs) framework that Blueprint San Diego (SD) is claiming it will establish. As a courtesy, we have attached our 2016 advocacy letter regarding CPUs for further reference.

We hope Blueprint SD is the opportunity for San Diego to develop and implement robust CPUs that will help the City make greater strides to meet and exceed its legally-binding Climate Action Plan (CAP) targets, and General Plan (GP) and Regional Housing Needs Allocation (RHNA) goals.

Below are our recommendations for Blueprint SD:

***Ensure the Program Environmental Impact Report (PEIR) Complies with CEQA Guidelines for Qualified Plans***

Blueprint SD is required to prepare a Program Environmental Impact Report (PEIR) which means that it is a CEQA-qualified, legally binding document. CEQA is clear about what is required for a qualified plan. For BlueprintSD to function meaningfully each measure and alternative in the plan must be enforceable—specific, unambiguous, and contain clear requirements. Voluntary measures that fall into the category of wishful thinking, good intentions, and an intent to 'work' with others violate CEQA Guidelines.

We recommend that the City ensure that Blueprint SD contains evidence-based and legally defensible measures that serve to make the plan meaningfully enforceable.

### ***Share Existing and Projected Mode Share Data for each CPU***

The City cannot meet its CAP mode share target goals if each CPU fails to meet its own. Unfortunately, the City has a long pattern and practice of not disclosing community specific mode shift projections to meet our legally binding CAP goals. CAC previously requested existing and projected mode share data for the Clairemont CPU but did not receive it in time to incorporate in our analysis of the CPU. We want to emphasize how critical mode share data is to ensuring the City can plan and meet its legally binding CAP transportation goals. The City must end its long practice of withholding mode share data from the community until the very end of the CPU process. Communities must have this information early on in the planning process to make informed and fact-based decisions, and we hope Blueprint SD will finally facilitate this.

### ***Set Specific Mode Share Targets for each CPU***

As long range planning documents that serve as a framework for the future development of the City's communities over the next 20 to 30 years, the city needs to ensure that CPU's sets specific targets for mode shift, and plans accordingly to achieve those targets in alignment with the CAP. Blueprint SD should ensure each CPU integrates MTS and SANDAG Regional Plans, projects and programs to set aggressive mode share targets tailored to a community's local context, and include strategies to meet them.

We also recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares in TPAs. Blueprint SD must also ensure CPUs will plan for and foster implementation of specific strategies that will induce mode shift from driving to biking, walking, and transit.

### ***Connect Blueprint SD to the Clairemont Mesa and Barrio Logan CPUs***

The Blueprint SD Public Notice of Preparation of a Program Environmental Impact Report and Scoping Meeting states that it "will be used to guide future community plan updates, the program also immediately includes the current ongoing comprehensive updates to the Mira Mesa and University Community Plans, and amendment to the Uptown Community Plan for the Hillcrest Focused Plan area." However, it does not include the Clairemont Mesa or Barrio Logan CPUs which are also currently in the updating process and may benefit from Blueprint SD.

Rather than permit more flawed CPUs from being approved, we recommend the Clairemont, Barrio Logan, and all other CPUs in the update queue be connected to the Blueprint SD framework.

The City gave a public notice of preparation of a PEIR for the Clairemont Mesa CPU in January 2020.<sup>1</sup> The EIR Technical Studies and Clairemont CPU draft were subsequently released for public review in July 2020 and May 2021.<sup>2</sup> CAC sent the City a letter regarding the [Clairemont Community Plan Update](#), which, unfortunately, does not include strategies to advance the development of affordable housing near transit and jobs, and continues to prioritize single family zoning over equitable, affordable mixed-use housing.

Barrio Logan is in the process of preparing an Addendum to the 2013 Certified EIR.<sup>3</sup> Section 2.2 Residential Land Use of the Barrio Logan CPU draft reads “One of the main goals of the Barrio Logan Community Plan is to expand and preserve the supply of affordable housing through the construction of new units.”<sup>4</sup> The City has a great opportunity to prioritize affordable housing in the Barrio Logan CPU by developing a more comprehensive plan that can also meet climate and equity goals with the community.

We also encourage the City to keep partnering with Clairemont and Barrio Logan community and place-based organizations and residents, and elevate how Blueprint SD may or may not impact their important work. This transparency will be important in building community trust in the CPU process.

### ***Take Action on Flawed CPUs***

Blueprint SD also fails to take into account previously approved flawed CPUs. CPUs in Golden Hill, North Park, San Ysidro, and Uptown, and more recent CPUs in Midway, Mission Valley and Kearny Mesa have been adopted without the necessary mode share targets and affordable housing requirements to help the City meet its legally-binding CAP goals, and local and state housing targets. We are concerned that these flawed plans will continue to fail to meet the needs of the community, particularly in the urban core neighborhoods of Golden Hill, North Park and Uptown where climate retrofitting will be easier to achieve.

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<sup>1</sup> City of San Diego “Public Notice of Preparation of a Program Environmental Program Impact Report and Scoping Meeting Planning Department” January 16, 2020

[https://9ff67c5d-1cd1-49a0-b96c-ff60f299d49e.filesusr.com/ugd/a513cc\\_0631959f59dd44a7a1be9b06e10068a9.pdf](https://9ff67c5d-1cd1-49a0-b96c-ff60f299d49e.filesusr.com/ugd/a513cc_0631959f59dd44a7a1be9b06e10068a9.pdf)

<sup>2</sup> San Diego Clairemont Engage “Studies and Technical Reports: EIR Technical Studies”

<https://www.clairemontplan.org/documents>

Clairemont Community Plan May 2021 Draft

[https://9ff67c5d-1cd1-49a0-b96c-ff60f299d49e.filesusr.com/ugd/a513cc\\_4f8effdd179a49f0af7e199c96b01763.pdf](https://9ff67c5d-1cd1-49a0-b96c-ff60f299d49e.filesusr.com/ugd/a513cc_4f8effdd179a49f0af7e199c96b01763.pdf)

<sup>3</sup>Resolution of The City Council of the City of San Diego Certifying the EIR for the Barrio Logan Community Plan Update, Oct 2, 2013

[https://www.sandiego.gov/sites/default/files/legacy/planning/community/cpu/barriologan/pdf/r-308444\\_eir\\_certification.pdf](https://www.sandiego.gov/sites/default/files/legacy/planning/community/cpu/barriologan/pdf/r-308444_eir_certification.pdf)

Final Program Environmental Impact Report (PIER) for the Barrio Logan Community Plan Update

[https://www.sandiego.gov/sites/default/files/legacy/planning/community/cpu/barriologan/pdf/peir\\_barrio\\_lo\\_gan\\_proposed\\_cpu\\_final.pdf](https://www.sandiego.gov/sites/default/files/legacy/planning/community/cpu/barriologan/pdf/peir_barrio_lo_gan_proposed_cpu_final.pdf)

<sup>4</sup> Barrio Logan Community Plan and Local Coastal Program Draft - April 2021, page 25.

[https://6b29e548-f8eb-4d4e-b966-52b476b52435.filesusr.com/ugd/ac25bf\\_44357dbb595945758fc599d2544badbd.pdf](https://6b29e548-f8eb-4d4e-b966-52b476b52435.filesusr.com/ugd/ac25bf_44357dbb595945758fc599d2544badbd.pdf)

We recommend the City develop a specific action plan for tackling its flawed CPUs, with an accompanying timeline.

### **Conclusion**

Thank you for the opportunity to weigh in on the development of this critically important document. Blueprint SD presents an opportunity to help protect the health and safety of future generations from the worst impacts of climate change. We urge the City to incorporate the recommendations above to maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses.

Sincerely,

*Madison Coleman*

Madison Coleman  
Policy Advocate  
Climate Action Campaign



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**July 8, 2016**

Rebecca Malone  
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City of San Diego Planning Department  
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***Via Email***

*RMalone@sandiego.gov*  
*PlanningCEQA@sandiego.gov*

**Re: San Ysidro, North Park, Uptown, and Golden Hill Community Plan Updates**  
*Climate Action Campaign CEQA Comments*  
*Project Nos. 21002568, 380611, and 310690*

Dear Ms. Malone:

Please accept the following comments on behalf of our client Climate Action Campaign regarding the Environmental Impact Reports (EIRs) for the San Ysidro, North Park and Golden Hill, and Uptown Community Plan Updates. Climate Action Campaign's mission is to stop climate change. To achieve this goal, Climate Action Campaign has been actively engaged in the development and passage of the City's Climate Action Plan. Now, Climate Action Campaign's focus is to ensure the Climate Action Plan is implemented, and its goals are achieved.

The City has an opportunity to make great strides in implementing Climate Action Plan goals with the adopted of Community Plan Updates. As noted below, however, each of the Community Plan Update EIRs fails to comply with the California Environmental Quality Act (CEQA) with respect to greenhouse gas (GHG) emissions. Until and unless these deficiencies are addressed, the EIRs will not withstand judicial scrutiny.

**I. The Climate Action Plan Is the City's Central Climate Plan**

The City's Climate Action Plan plays a pivotal and important role in not only reducing GHG emissions Citywide, but also mitigating the impacts of the City's General Plan. (CAP, p. 5). Eventually, this document will serve as a CEQA Qualified GHG Reduction Plan. In the interim, however, a project-level CAP consistency determination is an essential component of CEQA GHG impacts assessment. Inconsistency with a land use plan or policy intended to mitigate environmental impacts is likely to result in a finding of significant environmental impact. (See *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 934 ["Because the land use policies at issue were adopted at least in part to avoid or mitigate environmental effects, we consider their applicability under the fair argument test with no presumption in favor of the City."]).



As the mechanism to achieve compliance with State reduction goals, the CAP requires vigilance and, in light of the looming 2020 reduction target, immediate implementation. Such implementation is especially important in the context of long-term land use plans such as Community Plan Updates (CPU). Unfortunately, the CPU EIRs fail to ensure the necessary CAP consistency in 2020 and beyond. As detailed below, the EIRs therefore reveal a significant environmental impact with respect to GHGs.

## II. The EIRs Fail to Demonstrate Compliance with the Climate Action Plan

To determine whether impacts are significant under CEQA, all of the CPUs rely on a quantitative comparison of future buildout of current Community Plans with future buildout of the proposed CPUs. (See San Ysidro EIR, p. 5.4-16; North Park EIR, pp. 6.5-8-9; Golden Hill EIR, p. 7.5-8; Uptown EIR, pp. 6.5-7-8). Fundamentally, this analysis is improper.

First, the EIRs fail to address, much less analyze, environmental impacts pursuant to CEQA Guideline Section 15064.4(b). A lead agency should assess the significance of GHG emissions by considering the extent to which a project increases emissions compared to the *existing environmental setting*. (CEQA Guidelines §15064.4(b)(1)). All three Community Plan Update EIRs quantify existing emissions, as well as anticipated emissions for existing Community Plans at buildout, and emissions expected at buildout under the proposed CPUs.<sup>1</sup> (See Helix GHG Technical Report for San Ysidro CPU March 2016, pp. 15 and 27; RECON Supplemental Analysis to GHG Analysis for Uptown, North Park, and Golden Hill CPUs, May 16, 2016, pp. 6-8). Nonetheless, the EIRs fail to address the increase in emissions associated with the CPUs – especially in 2020 and 2035 when compared with the existing emissions – or explain why such increases are not significant.

Perhaps more importantly, the CPU EIRs and appendices do not put such increased emissions in context considering the Climate Action Plan reduction goals. The Climate Action Plan requires a **15 percent reduction from 2010 baseline emissions** by 2020, a **40 percent** reduction by 2030, and a **50 percent** reduction by 2035. (CAP, p. 21). Notwithstanding these ambitious CAP GHG reduction goals, and the CPUs' *quantitative* inconsistency with the CAP, the EIRs simply presume CAP consistency based on a *qualitative* analysis. The CPUs make this determination, in part, by claiming the CAP assumes growth based on the Community Plans in effect at the time the CAP was being developed. (See San Ysidro EIR, p. 5.4-8; Uptown EIR, p. 6.5-6; North Park EIR, p. 6.5-5; Golden Hill EIR, p. 7.5-5 ["The CAP assumes future population and economic growth based on the community plans that were in effect at the time the CAP was being developed. Therefore, community plan updates that would result in a

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<sup>1</sup> The Helix GHG Technical Report for the San Ysidro CPU does not indicate in which year buildout occurs. Because construction emissions are annualized for thirty years, presumably buildout occurs in the next 30 years. (See Helix GHG Technical Report for San Ysidro CPU March 2016, p. 24).

reduction in GHG at build-out compared to GHG emissions at build-out under the adopted Community Plan would result in further GHG reductions.”]). However, the phrase “2010 baseline emissions” cannot be read to mean a baseline defined by “emissions at buildout of Community Plans as they existed in 2010.” This approach fails under the CAP and under CEQA.

Though the CAP assumed population growth in calculating *business-as-usual* emissions, nothing in the CAP or CAP appendices indicates GHG reduction modelling relied on existing Community Plans ever actually achieving this buildout. As such, the CPUs’ reliance on full buildout at plan levels as a baseline is speculation and does not amount to substantial evidence. (Pub. Res. Code § 21082.2(c); CEQA Guidelines, § 15384(a) [“Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.”]).

Rather, the CAP’s narrative goals and modelling appendices indicate the exact opposite is true: the CAP expects, and indeed relies on, Community Plan updates that will alter land-use patterns and shift density to Transit Priority Areas. The CAP includes goals to implement the City of Villages Strategy in Transit Priority Areas and promote effective land use to reduce vehicle miles traveled. (CAP, pp. 37-39). Specifically, a CAP supporting measure requires achievement of better walkability and transit-supportive densities “by locating a majority of all new residential development within Transit Priority Areas.” (CAP, p. 39).

Parts of San Ysidro and the majority of Uptown, North Park, and Golden Hill are within Transit Priority Areas, but the EIRs and associated GHG analysis appendices fail to quantify: (i) how the CPUs implement the GHG emission reductions associated with CAP strategies, particularly increased density in TPAs; and, (ii) if such reductions meet the CAP 2020, 2030 and 2035 goals. Such quantitative consistency is particularly important here because to achieve the requisite reductions, the CAP relies heavily on Strategy 3, Bicycling, Walking, Transit and Land Use. Strategy 3 comprises one of the largest shares of local reduction actions. (CAP, p. 30). In the earlier years of the CAP, Strategy 3 is responsible for 36 percent of GHG emission reductions Citywide. Within Strategy 3, “Mass Transit” and “Promote Effective Land Use to Reduce Vehicle Miles Traveled” are two of the largest reduction sub-strategies. (*Id.*).

Such modeling is achievable. The CAP models VMT (and associated GHG) reductions associated with each CAP strategy. (See CAP Appendix A, pp. A-31-A-38). Further, VMT reduction modeling was conducted as part of the CPU EIRs. Nonetheless, the EIRs fail to quantitatively bridge the analytical gap between: (i) the CPU VMT and associated GHG

reductions; and, (ii) the correlating CAP GHG reductions. (See, for example, Uptown, North Park and Golden Hill CPU Appendix E.2. Attachment 1).<sup>2</sup>

This data is also a critical component of demonstrating CAP compliance. Without such data and analysis, numerous questions remain regarding CAP reduction measures. For example, if these four CPUs result in a net increase in emissions in both 2020 and 2035 compared to the 2010 baseline, and all other CPUs are similarly evaluated based only on an expected reduction in emissions compared to full buildout of adopted Community Plans – *despite an increase from existing emissions* – where will the reductions come from? If these four CPUs result in an increase in GHG emissions in 2020 and 2035, reductions from other future land use decisions will have to be even greater to make up for such increases, and it is unclear where such opportunities exist.

As the California Supreme Court recently found in *Center for Biological Diversity v. Department of Fish & Wildlife* (“*Newhall Ranch*”) (2015) 62 Cal.4th 204, the EIRs here fail to bridge the analytical gap between the increase in CPU emissions and consistency with the CAP:

The analytical gap left by the EIR's failure to establish, through substantial evidence and reasoned explanation, a quantitative equivalence between the Scoping Plan's statewide comparison and the EIR's own project-level comparison deprived the EIR of its “sufficiency as an informative document.” (*Newhall Ranch, supra*, 62 Cal.4th at 227, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392).

As the planning mechanism to shape future development in these planning areas, the CPUs must result in CAP-mandated reductions *now*.<sup>3</sup> Nevertheless, the EIRs contain no mention of the appropriate allocation of reduction measures attributable to CPU implementation. The CPUs' increase in GHG emissions is counterfactual to a CAP consistency determination. Because the EIRs fail to adequately address the “quantitative equivalence” between the City's CAP and the CPUs, the EIRs are insufficient and the CPUs will result in significant GHG impacts.

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<sup>2</sup> See also, Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan, SCH #2014121002, April 26, 2016, p.E-8,9 (reflecting achievement of active transportation mode share increases based on quantitative modeling).

<sup>3</sup> The Supreme Court also posited that “a greater degree of reduction may be needed from new land use projects than from the economy as a whole” in light of the fact that new development is more easily designed to reduce GHG emissions. (*Newhall Ranch, supra*, 62 Cal.4th at 226).

### III. Conclusion

The current CPU EIRs fail to meet applicable CEQA mandates. The CPU EIRs must assess quantitative compliance with the Climate Action Plan, its reduction targets and goals. As drafted, the EIRs demonstrate a lack of compliance with Climate Action Plan goals because all four CPUs result in an increase in GHG emissions compared to baseline rather than a decrease of 15 percent by 2020, 40 percent by 2030, and 50 percent by 2035. Climate Action Campaign urges the City to conduct the requisite analysis and recirculate the EIRs for further public comment.

Thank you in advance for your consideration of our comments.

Sincerely,

**COAST LAW GROUP, LLP**



Marco Gonzalez  
Livia Borak  
Attorneys for Climate Action Campaign

cc: Client



**Friends of Rose Canyon**

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August 18, 2021

To: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

Re: Blueprint San Diego Notice of Preparation

Dear Ms. Malone,

Friends of Rose Canyon submits the following scoping comment on the Blueprint San Diego (BSD) Notice of Preparation. Friends of Rose Canyon has worked for many years for the protection and restoration of habitat, primarily MSCP lands, in Rose Canyon, in the University Community Plan area and citywide.

Friends of Rose Canyon also has a seat on the University Community Plan Update Subcommittee, which the City convened to include resident, business and non-profit organization representatives from across the community. City staff, along with the City's multiple outside consultants (paid for, I believe with SANDAG grant money) have held meetings regularly of the UC Plan Update Subcommittee for the better part of three years to present information and alternative scenarios and gather input. Over the three years, Friends of Rose Canyon has encouraged many people within and beyond the UC Plan area to participate in the UC Community Plan Update process, and the City has done public outreach in the community. Many lobbyists for developers have attended these meetings as well.

We find it disturbing that the UC Plan Update Committee was never informed that the City was pursuing a separate track, disclosed in the BSD NOP, to simply override years of presentations, input and discussions at the UC Plan Update Subcommittee. Furthermore, we find it disingenuous that, after years of our meetings with such diverse stakeholders participating, the NOP states that the BSD changes "will allow for greater and more tailored public engagement to best inform the needs of our communities and ensure public engagement is representative of the demographics of the community."

We also find it a fundamental flaw in the BSD that the City is proposing to give away millions of dollars in land value to developers, some of whom may well be Wall Street REITs or other big investors. Rather than pursue the concept of Land Value Recapture or some other form of capturing for the City some of the big profits that will accrue to developers at the stroke of a pen when their development rights are suddenly greatly increased, the City is keeping its own coffers strapped. The City struggles year after year with multiple long-term funding deficits that include insufficient funding for its parks, libraries, streets, MSCP lands, homeless services, and of course has built up billions of dollars in unfunded stormwater infrastructure projects.

The BSD EIR needs to answer the question why the City is not capturing some of the millions of dollars at stake for its own coffers to benefit the people who live here?

Worse yet: the BSD will come with big costs for the City. I have asked City staff involved in the UC Plan Update Subcommittee, who will actually pay for the millions of dollars in infrastructure related to meeting the CAP goals and reducing VMT, infrastructure such as miles of protected bike lanes, plus costs associated with increasing the population: new parks, expanded libraries, increased services, things that the City currently has insufficient funds for.

**The BSD needs to address the economic issues related to the problems it seeks to address (meeting the CAP goals, reducing VMT and greenhouse gas emissions, and providing “Homes for All of Us.”) Who walks away with the money, and which of the stated intended benefits actual materialize? And why is the City not walking away with a substantial amount of the profits that the BSD will generate?**

**1. The BSD Project Description needs to delete the following:**

**“The University Community Plan Update will also identify trails within open space areas ...” and**

**“The Mira Mesa Community Plan Update will also identify trails within open space areas.”**

The issue of trails is misplaced in the BSD NOP. Trails are not mentioned anywhere in the Staff Report to City Council dated 4/03/20 requesting approval to apply for the \$1.5 mil State of CA LEAP grant, which is funding this EIR. The Staff Report’s focus was on increasing residential density in Transit Priority Areas (TPAs).

The open space lands in the UC and Mira Mesa Community plan areas are primarily in the MSCP. The MSCP is the City’s 1997 contractual plan and permit, signed with state and federal regulatory agencies, to create an endangered species preserve system to mitigate the effects of development in the city. The goal of the MSCP is to maintain and enhance biodiversity and protect sensitive species and their habitats on MSCP lands. The City must maintain its contractual commitment to these goals, which are very different from the goals of the BSD.

Trails in MSCP lands do not belong in the BSD. On 8/3/21, the City approved a Parks Master Plan (PMP) that contains multiple goals and guidelines related to the City’s MSCP commitments and responsibilities. The PMP also includes direction and criteria to create a follow-on Trails Master Plan. As an initial step, to creation of the Trail Master Plan, City staff committed at the hearing to conduct a full evaluation of the MSCP. That is a key first step, as the City has never had sufficient funding to adequately protect and manage its MSCP lands.

## **2. BSD EIR Project Description: Vague, far reaching and with no method to assess impacts**

The Project Description is so broad and vague in scope, actions, location and timing that it is impossible to assess the actual activities it will cover and the multiple direct, indirect and cumulative environmental impacts those activities might have. The BSD implies that major land use decisions almost anywhere in the city at any time in the future will be covered by this single vague, far-reaching EIR, no matter what the specific direct, indirect or cumulative impacts are. Furthermore, there is no mechanism in the BSD to assess what the actual impacts turn out to be that are the result of granting with the stroke of a pen huge new development densities “by right.” The BSD needs to build in an assessment process on a regular basis so the City can evaluate the impacts of these sweeping changes based on what happens on the ground.

As the saying goes, “what could possibly go wrong?”

To answer that question, the BSD should phase in slowly and create a few test case projects that it implements and then assesses what could go wrong, and what measures might be put in place to avoid those problems in future “by right” density increases. The assessment should also study whether those projects actually achieve the intended goals of the BSD.

**For example, the BSD uses the term “data driven” as if that were magically going to avoid unintended impacts or magically ensure the Project goals would be met:**

“A fundamental objective of Blueprint San Diego will be to further the Climate Action Plan by establishing a framework for strategic land use planning that will achieve the City’s greenhouse gas emissions reductions targets through reduced Citywide vehicle miles traveled. . . These “data-driven thresholds” will be used to guide future Community plan updates and other implementation actions.

**The BSD needs to specify: What are the data and how will they be collected and analyzed?**

The Climate Action Plan was adopted by the City in 2015, and yet in the University Community Plan area we have seen no indication that its goals have had any significant impact on the City’s approval of large development projects, many of which make no significant change in either mode share (transit, biking walking) or VMT. Neither the CAP nor the VMT “data-driven thresholds” make much difference when: a) the City allows major increases in development without mandating any significant reduction in traffic generated by project proponents b) the City allows major increases in development in Transit Priority areas but without providing the necessary new protected bike lane infrastructure necessary to increase bike mode share from its current rate of near zero in the area (exactly what is proposed in BSD); and c) the City allows major increases in development rights for housing in TPAs that include high rise towers with luxury housing, a smattering of income-restricted units, and no moderate income units, thus adding housing that is lived in by low-propensity transit riders, and d) the City allows major new development for commercial projects in or near TPAs but incorporate minimal or no requirements to reduce the VMT of employees working in those projects.

The BSD needs to contain provisions that change this situation. The City must stop giving away huge increases in development rights without any requiring measures to ensure that increased density will make a significant (or any) difference in reducing VMT or achieving the CAP goals.

The BSD EIR needs to acknowledge that “data driven thresholds” mean nothing if they do not result in actual significant changes in mode share and VMT reduction. The EIR needs to describe how granting developers vast new “by right” increases in density will actually make significant impacts in meeting the CAP goals and the VMT reduction goals. Our transit system is poor in San Diego. The jury is still out on whether the soon-to-open Midcoast Trolley will actually have enough ridership to make a dent in VMT or mode share in the areas it serves. The BSD EIR should require a study of the Midcoast ridership and its impact on VMT and mode share. When approved by SANDAG, the Midcoast was projected to have relatively poor ridership. It’s speed is slow, and the UCSD to Downtown bus is being eliminated once the Midcoast opens (thus that ridership should be deducted from the Midcoast ridership assessment). The City has little safe bike infrastructure (or even unsafe bike infrastructure) within or near the TPAs in the University Community Plan Area, and construction of protected bike lanes can take years of planning and design and cost many millions of dollars a mile. Meanwhile, the BSD proposes to greatly increase both the amount of development allowed in TPAs and the speed at which that increased development happens. The BSD contains no matching commitment to improving transit or bike infrastructure in synch with that increased development.

The BSD Project Description thus proposes to rush forward with one ingredient - increasing density in TPAs (an action that developers will likely be quick to take advantage of) and fails to address the simultaneously necessary ingredients of meeting the CAP goals and VMT reduction targets, things which at this point have no proposed source of funding or timeframe for being implemented.

### **3. The BSD includes ill-defined and variable descriptions of the areas of impact.**

In various documents, the BSD gives its focus as 1) TPAs 2) lands “near” TPAs 3) future TPAs (unknown locations). In essence, there is no limit on the lands or areas that would be covered by these “by right” development increases, no matter what the direct or indirect or cumulative environmental impacts might be.

#### **The BSD should clarify that its focus is residential units in TPAs**

The Project Description is not only overly expansive but it reflects a morphing in purpose beyond what was presented and endorsed by the San Diego City Council in the April 3, 2020, Staff Report when the Council approved the City’s application for the LEAP planning grant that is funding the BSD EIR. The Staff Report to the City Council focused on: strategies to produce “residential units” within TPAs, and analysis of environmental effects of maximum new development scenarios within TPAs. BSD should focus on this goal. However, the Project Description has inappropriately expanded to include areas “near” TPAs and to add “trails” in open space areas in the University Community and Mira Mesa Plan Updates.



**4. Nothing in the BSD Project description guarantees that the City of San Diego will come remotely close to meeting its RHNA goals. The Staff Report (4/03/20) on the application for the LEAP grant stated:**

“In line with the City’s Climate Action Plan and the City’s draft General Plan Housing Element Update, the City plans to increase planned growth by identifying future capacity for at least 150,000 additional residential units within TPAs. This will help to accelerate production and facilitate compliance with implementation of the City’s 6<sup>th</sup> cycle of the Regional Housing Needs Assessment (RHNA) process and add housing capacity towards the City’s 7<sup>th</sup> RHNA cycle. . . . By preparing a single EIR that covers the City’s planned growth within TPAs, future development can be further streamlined for forthcoming community plan updates so that new residential development can be processed ministerially, by right.”

Yet in the last RHNA assessment, the City built very little of the “Very Low Income” and “Low Income” units needed, almost none of the “Moderate Income” units needed, and plenty of above moderate income units.

The EIR needs to explain how “by right” increases in housing density for developers will significantly improve not just the amount of housing that is built but that the kind of housing built is the kind the City needs to produce to meet its RHNA goals. The kind of housing the City needs is exactly what the market has failed to deliver. In addition, in recent years the San Diego housing market has been greatly influenced by the influx of REITs and other Wall Street investors. The BSD EIR needs to address how this Project will deliver what it is promising (lots of new housing for all income levels) given the reality of today’s housing market.

The BSD EIR needs to include in its goals a substantial percentage of housing for very low, low and moderate income households, including families, as they are higher propensity transit riders and are key to achieving the BSD goals of addressing CAP goals and reducing VMT with this program. Given that this EIR will apply to the UC and Mira Mesa Plan Updates, how will the BSD achieve that in those areas?

**5. Land Use and Mobility Thresholds for Future Community Plan Updates**

The Project Description states that “Blueprint San Diego will identify minimum housing and employment intensities for areas near and within future and existing Transit Priority Areas through the City.” Allowing “by right” increased development intensity does not necessarily equate with reaching the CAP mode share targets or reducing VMT. The BSD EIR needs to acknowledge that the issue is considerably more complex and provide actual data for its claims. For example, in the University Community Plan Area, there is almost no protected bike infrastructure, and there is heavy, fast traffic. In our UC Community Plan Update meetings, planners from the City have proposed removing lanes of traffic the entire length of Genesee Ave and Nobel Drive in order to build protected bike lanes. However, the proposal has, at this time, no basis in reality. There has been: no traffic study to assess the impact of the removal of an entire lane of traffic in each direction for the length of two of the major streets while simultaneously allowing large increases in density in the area; no

study of whether or how the intersections would work safely for bikes; no assessment of how much the bike infrastructure would cost (from the cost of other major roads with protected bike lanes, it could easily be \$50+ million); no discussion of where the funds would come from and when the funds might be available and the projects designed and built. Thus, adding large amounts of “by right” development may produce a great deal of increased density but do nothing to change the bike mode share. And building primarily luxury high density housing will attract residents who are low propensity transit riders - and likely low-propensity bike riders as well. And the jury is definitely still out on how much the Midcoast Trolley will move the needle on transit mode share.

**6. The BSD EIR needs to address the issue that simply planning for Infrastructure that will work in tandem with the proposed increases in density does not mean that the needed infrastructure will get built.**

The City has had infrastructure planners assigned to community plan updates. In UC Plan Update meetings, we have had them present plans for major new protected bike lanes the length of Genesee Avenue and Nobel Drive (many millions of dollars’ worth of bike infrastructure). But when I have asked, what funds will pay for these, and when might they actually get built, I was told, “That’s a different department. We have no control over that.” The City’s preparation of a PowerPoint presentation on possible bike infrastructure means little. What the BSD EIR needs to address for the UC and Mira Mesa Plan Updates is:

- a) what funds will pay for the infrastructure and what is needed?
- b) what is a realistic estimate of what that infrastructure will cost?
- c) when will sufficient funds be available to actually build that infrastructure?
- d) will the developers whose land, at the stroke of a pen, suddenly increases by millions of dollars in value due to the new “by right” density increases, be required to contribute sufficient funds to actually build the infrastructure?
- e) what happens if, with the stroke of a pen, developers are allowed to build greatly increased density in TPAs and large density increases occur years before the infrastructure for protected bike lanes and other mobility features are built (or if they are never built, and the “mobility features” are wiped away in the next community plan update).

**7. The BSD EIR needs to address the issue that decisions regarding increased density will be made in a hurry, while there is no hurry to add the improved transit and protected bike lanes and other items that will be needed to actually meet the City’s CAP and VMT goals. The BSD states speed of density increases as a selling point:**

For example, regarding the UC Plan Update, the BSD states:

“The updated plan would re-designate and rezone land to increase residential capacity by 10,000 to 30,000 units. Whereas the ministerial review process for development projects generally takes 9 to 12 months, the discretionary permit process is more complex and can take approximately 18 to 32 months due to the need for environmental review, the public hearing process, and the potential for an appeal. Changes to the community plan to allow by-right

development will reduce permit processing times and overall costs and allow for high density mixed use housing to develop sooner.”

**Meanwhile, the BSD proposes no intention or plan or mechanism to assess what (if any) impact the proposed big increases in density will have on meeting CAP goals or reducing VMT or on addressing the RHNA goals. Nor does it propose to assess what the negative impacts might be of huge new “by right” density increases. The EIR should include a requirement that once a few of these by right density increase projects have been approved and built, there be a fact-based and independent evaluation on what the impacts have been on meeting the goals of the BSD and what progress has been made on associated infrastructure such as protected bike lanes.**

**8. The BSD EIR needs to include a realistic Project Alternative that complies with CEQA: that meets many of the Project Goals but reduces the Project impacts. By thinking through the issues and problems and potential failures inherent in this vast expansive new “by right” density entitlement, the City might well come up with a Project with a more limited scope that is more carefully thought out and with a better chance of succeeding in achieving the Project’s goals.**

**In developing the Project and the Project Alternatives, the EIR should include an analysis of the following. And, for whatever Project is approved, the Project should include a mandatory process for the City to collect, analyze and disclose the following on an annual basis:**

- A. Who walks away with the money and how much money from the proposed “by right” development intensity increases?
- B. What level of the Project Goals are actually being met and when and how does the City know? Project Goals include at least: meeting the CAP goals, reducing VMT, and meeting the RHNA goals for very low, low and moderate income housing
- C. What information will be collected to answer these questions and how will it be evaluated and reported?

### **9. Caveat emptor**

The Project should include a mechanism for the City to rescind the “by right” density increases at any time for any reason: In the event the Project is not achieving its goals or turns out to be a bad financial deal for the city (how could that ever happen?) or for any reason that the City decides. **If the “by right” density increase program cannot legally be rescinded, the City should not approve it. The City should explore this issue thoroughly and stand on firm legal ground before signing away millions of dollars in development rights that will be gone forever.**

**I suspect that were the City to pass the BSD, there would be no way to take back those “by right” density increases. Those millions of dollars would be permanently lost to the City. For that reason, the City should not pursue the BSD Project as presented in the NOP.**

Sincerely,

*Deborah Knight*

Deborah Knight  
Executive Director

## Stacey Higgins

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**From:** AHayes SOHO <ahayes.sohosandiego@gmail.com>  
**Sent:** Tuesday, August 17, 2021 3:10 PM  
**To:** PLN\_PlanningCEQA  
**Cc:** Bruce Coons; Marlena Krcelich; Bailey, Brittany; Vonblum, Heidi  
**Subject:** Blueprint San Diego, NOP - SOHO comments  
**Attachments:** Blueprint San Diego NOP - SOHO comments.pdf

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

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Ms. Malone,

Please see the attached comment letter related to the Blueprint San Diego Notice of Preparation.

Thank you,

Anie Hayes  
Senior Historic Resources Specialist  
Save Our Heritage Organisation (SOHO)  
3525 Seventh Avenue  
San Diego, CA 92103  
Office: (619) 297-9327

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Save Our Heritage Organisation  
Protecting San Diego's architectural and cultural heritage since 1969

Tuesday, August 17, 2021

Rebecca Malone, Senior Environmental Planner  
City of San Diego Planning Department  
9485 Aero Drive, MS 413  
San Diego, CA 92123

Re: Blueprint San Diego, Notice of Preparation

Ms. Malone,

Save Our Heritage Organisation (SOHO) has reviewed the Notice of Preparation for the Blueprint San Diego project and supports the goal for a framework to guide future community development over the next 20-30 years. We support the data driven approach and recognition of the various unique community character that is present across the county. However, for a well-balanced approach, SOHO strongly encourages the city to incentivize the reuse of existing building stock. Not only is the adaptive reuse of existing buildings more sustainable, but often these resources are located within the Transit Priority Areas that need affordable housing the most. In addition to building new, the City must facilitate more opportunities to update and reuse the existing built environment as well as study how other comparable cities are reusing theirs. Reuse of what currently exists will create affordable housing faster, due to less process and construction timelines, and cheaper due to the adaptation and reuse of existing building, which retains people in their neighborhoods, minimizing displacement.

Historical resources and cultural landscapes are essential to the way we understand the built environment around us and must be included within any community planning approach. As this framework project will consider the unique communities that are present, part of this assessment should include a historical resources survey and designation effort to balance the areas identified for new growth and change. Communities should also assess and document where the naturally affordable housing stock exists now to help identify where new development is best located. And, the recently passed state Historic Tax Credit can be combined with the Federal Historic and Low-Income Housing tax credits.

SOHO supports the data driven approach but this should be expanded to track the number of housing units entitled, permitted, and built each year. Demolition data and our existing natural affordable housing should also be captured and used to San Diego's advantage. This will help illustrate how under-market rentals and ownership opportunities are lost and what we can do to address this.

Older buildings play an important and often overlooked role in housing affordability across the country. First, housing preservation is typically cheaper and faster than constructing new units and effectively combats blight. Numerous studies have shown that older and historic neighborhoods offer a diverse housing stock at varying prices, sizes, and conditions, and are located in close proximity to transit and jobs. And, when gentrification is a concern, homeownership is the ultimate defense. Therefore, keeping residents in existing homes should be a priority. Since we understand that one cannot build new and rent or sell cheap without subsidy, then it logically follows that with the demolition of each pre-1960's era housing stock unit, an affordable housing unit is then lost forever. As with many other cities attempting to address the housing affordability issue, data could show that San Diego is systematically razing housing that is affordable and building housing that is not.

SOHO recommends the current pre-1960s naturally affordable housing stock be incentivized to substantively contribute toward San Diego's affordable housing needs within every community. Older building stock plays an important role in meeting affordable housing demands, which is why it's important to develop policies that promote repair and maintenance over demolition and new construction. See the San Antonio 2019 Affordable Housing Study that identifies a number of viable solutions:

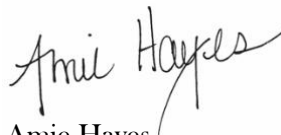
<https://www.sanantonio.gov/Portals/0/Files/HistoricPreservation/CurrentProjects/AffordableHousing/OpportunityAtRisk-Report.pdf>. This study explains well the role of older building stock to meet current affordability needs, which is related to the patterns of location, condition, and ownership; their vulnerability to demolition; and helps maintain single-family home ownership.

In conclusion, SOHO agrees that a framework approach for long-term planning is a good strategy and we support the data-driven methodology, but we must recognize and help protect the unique community character of every planning area and incentivize use of the existing built environment to retain affordability, reduce displacement, and protect the character and features that make each San Diego community a special place to live.

Thank you for the opportunity to comment,



Bruce Coons  
Executive Director  
Save Our Heritage Organisation



Amie Hayes  
Senior Historic Resources Specialist  
Save Our Heritage Organisation

## Stacey Higgins

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**From:** Andrew Wiese <awiese@sdsu.edu>  
**Sent:** Wednesday, August 18, 2021 4:59 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Blueprint San Diego - PEIR - Scoping Comments - Wiese pt 1  
**Attachments:** Blueprint SD Wiese scoping comments part 1 8-18-21.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Dear Ms.Malone,  
Please record the following comments as part of the Scoping process for the Blueprint San Diego PEIR.  
Please let me know if you have any questions.  
Thank you for your time and your work on behalf of San Diego's environment.  
Sincerely,  
Andrew Wiese



**Scoping Comments  
Blueprint San Diego  
Programmatic EIR in compliance with CEQA**

**August 18, 2021:**

**From:  
Andrew Wiese  
University City, San Diego, 92122  
Chair, University Community Plan Update Subcommittee**

**To:  
Rebecca Malone, Senior Environmental Planner, City of San Diego Planning  
Department, 9485 Aero Drive, MS 413, San Diego, CA 92123.  
[PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)**

Dear Ms. Malone,

Please consider the following scoping comments in relation to the preparation of the PEIR for the **Blueprint San Diego project**.

**1. Trails planning:**

**Trails planning should follow the guidelines and process recently approved by the City of San Diego as part of its Parks Master Plan, including meeting relevant environmental guidelines and obligations.**

Trails planning is an inappropriate subject for the Blueprint PEIR given the adoption of this updated process.

The City has just approved a Parks Master Plan (City Council, August 3, 2021) that includes direction and criteria for trails planning including guidelines for a follow-on Trails Master Plan (TMP). The city should follow this responsible process to future trails planning, and it should do so in a timely manner.

Trails planning, preliminary proposals, or funding, including as part of Community Plans or programmatic environmental review envisioned by Blueprint SD, should not take place until it can be completed as part of this considered and responsible process, which the city has outlined and City Council has just approved.

Trails planning should not be included as part of the Blueprint SD PEIR lest the Blueprint become a bureaucratic backdoor to trails planning, evaluation and approval that violates the spirit and the letter of the Parks Master Plan.

Even more emphatically, Blueprint SD and specific community plan updates should not become a backdoor to avoiding the City's legal obligations to its Multiple Species Conservation Program (MSCP), Vernal Pool Habitat Conservation Plan, Natural Resource Management Planning/Plans, Environmentally Sensitive Lands regulations, or other environmental commitments.

1a: Through the Parks Master Plan (PMP), the City has committed to a set of guidelines for prior review of trails proposals and planning to ensure that these are consistent with its environmental commitments, including its legal obligations under the MSCP and other relevant documents.

The Parks Master Plan specifically outlines these goals and guidelines:

*“Proposed trails and recreation on lands conserved pursuant to the Multiple Species Conservation Plan (MSCP) will meet the MSCP conditions for compatibility through appropriate biological analyses. (PMP, Note, p22)*

**PP10:** *To ensure the City adheres to its conservation commitments, all proposals for new or revised access, trails, and active uses in resource/open space parklands must comply with all applicable limitations, such as the MSCP consistency findings, Environmentally Sensitive Land regulations, Natural Resource Management Plans, etc. before being formally proposed for City evaluation and funding (see policies CSR25 and RP5).*

**CSR 22:** *Prior to funding and developing trails, determining trail alignments, or determining which types, levels, and timing of recreation will be allowed to provide access to nature, ensure that the proposals will adhere to the City’s Multiple Species Conservation Program, Environmentally Sensitive Lands regulations, and other relevant obligations, and that Trails and Recreation Planning Guidelines (see Policies CSR25 and RP5) are employed. See also Policies PP10, CO3 and CO10.*

**CSR 25:** *Develop, adopt, and update a Citywide Trails Master Plan to guide the provision and enhancement of open space multi-purpose trails that accommodate pedestrians, hikers, bicyclists, mountain bikers, and equestrians, where appropriate, and to provide safe and convenient linkages to parks, recreation facilities, and open space areas consistent with policies PP10, CO3, CO10, CSR16, and CSR22.*

*A Trails Master Plan shall include a set of criteria and guidelines for evaluating and establishing thresholds of access and use for Open Space parks that prioritize habitat management planning and other requirements in ESL policy and MSCP obligations in advance of specific trails planning. These criteria and guidelines will reflect and encompass the current science of recreation ecology.”*

1b: As noted, the PMP and guidelines for a follow on Trails Master Plan specify that the City will complete its MSCP-required Natural Resource Management Plans in natural parks prior to additional trails planning.

- Trails planning as part of the Community Plan Update process that does not follow from Natural Resource Management Plans violates the City’s commitment to its management of MSCP lands.

1c. In addition, at the City Council Meeting on Aug. 3, 2021, the City of San Diego also committed to a comprehensive MSCP review, including a needs and budget assessment, as a preliminary step to beginning work on the Trails Master Plan. (City Council minutes, Aug. 3, 2021).

- The Blueprint SD should not include review of trails planning prior to completion of this review.

**Summary:**

These well-considered conditions developed and approved in the PMP must be applied to the Community Plan Update process and the envisioned Blueprint PEIR, or else the City's recently approved Parks Master Plan will be mute.

A programmatic EIR that overlaps with the MSCP lands cannot be adequately completed without Natural Resource Management Planning as specified by the MSCP.

All MSCP lands, open space parks, and natural parks should be removed from consideration under any programmatic EIR approach.

Environmental approval for trails planning should be removed from consideration as part of the Blueprint PEIR, in particular, so that the procedure just adopted as part of the PMP can work as designed.

## 2. Project description:

- The project description of the Blueprint PEIR is poorly defined and insufficiently limited.

- It includes undefined areas of impact: notably, lands 'near' Transit Priority Areas, lands in or 'near' to 'future' Transit Priority Areas, and lands affected by 'trails' planning, including open space, environmentally sensitive lands and habitat conservation areas, which may or may not be in the vicinity of a Transit Priority Area.

- Effectively, the Project Description places **no limit** on lands or areas that will or may be approved for by-right development under this PEIR.

- This poorly defined and unlimited Project Description places an unfair burden on the public in understanding or imagining potential impacts which is necessary for effective scoping comments. Because there is no limit to the areas that may be included under its definition, Blueprint SD obviates required public disclosure, and it limits the effectiveness of public input.

- The Project Description is not only overly expansive, but it reflects bureaucratic creep beyond what was presented to and endorsed by the San Diego City Council in April 3, 2020, when the Council approved the LEAP planning grant.

- As noted, the Blueprint PEIR would expand the scope of review beyond the purposes endorsed by elected officials... to include areas 'near' TPAs, 'future TPAs,' and 'trails' which may be planned for Open Space areas anywhere.

- By contrast, the Staff Report to City Council, (Apr.3 2020), focused on strategies to produce '**residential units' within Transit Priority Areas** and on analyzing environmental effects of maximum new development scenarios **within the Transit Priority Areas.**" (April 3, 2020, Staff Report to City Council).

- In particular, the Staff Report to City Council does not mention trails, areas 'near' TPAs or undefined 'future' TPAs.

- Blueprint SD should limit its area of focus to current TPAs, as outlined by staff in April, 2020.

- Proposals to add other areas 'near' TPAs or 'future' TPAs should be reconsidered specifically at such time as they are proposed in the future so that foreseeable environmental impacts can be adequately assessed.

- Trails should be removed from consideration as part of Blueprint SD, for the reasons outlined in section 1 above. Removal of trails, which are insufficiently related to the production of residential units, should work not hardship on the expressed focus of the Blueprint project.

### 3. Threat to meaningful CEQA review:

- The vaguely defined, expansive Project Description and Process proposed by the Blueprint PEIR would appear to preempt CEQA evaluation at a level of detail that is necessary for meaningful for public review and disclosure for adequate planning and to meet environmental law.

- In effect, the Blueprint SD PEIR proposes that the city write a **blank check** for unspecified, undefined or incomplete Community Plans as well as for major public and private development projects whose scope and location is not adequately defined or described, and whose environmental impacts cannot be foreseen because they have yet to be planned or even proposed.

- The Blueprint envisions PEIR approval for specific Community Plans prior to the adoption – or, in the case of University, even formal presentation and public review – of these specific plans and the multiple environmental impacts they might include.

- The Blueprint PEIR proposes to evaluate environmental impacts of plans that have yet to be presented for public review, much less formalized or adopted for consideration.

- From this layperson's perspective, Blueprint SD would appear to violate the CEQA requirement to disclose specific and reliable information in sufficient detail to allow the public and public officials to accurately evaluate the foreseeable environmental impacts of a given project or policy.

### 4. Impacts on Public Input through Community Planning Process:

- One likely result of Blueprint SD would be to preempt and limit public input, disclosure and review of community plans whose environmental impacts cannot be foreseen because they have yet to be planned or proposed.

- Given the undefined and unlimited nature of the Blueprint PEIR, one step necessary to avoid the evasion of specific and relevant public input provided through the public CPU process should be that the Blueprint the PEIR process **incorporate, review, and evaluate all relevant public input provided through CPU processes, which the public has invested time and thought in providing.**

- In the case of the University Community Plan Update (UCPU), a public subcommittee (UCPU-S) has been at work providing feedback for almost three years, including dozens of public meetings and thousands of hours of public time and engagement.

- To date, the city has not presented specific housing targets outlined in the Blueprint project description or plans to meet them. This failure to disclose available information to the UCPU-S and the public in general would seem to preempt, override, and ignore potential public input on a critical city-wide policy, as it would affect a Community Planning process well underway.

- Of particular concern, the City failed to disclose to the public and to the UCPU-S, its actual planning process, housing targets and their potential impacts in the University Community, which have been known in developing detail since at least April, 2020, when the City began planning for the direction outlined in Blueprint SD.

- The claim that Blueprint SD would increase the opportunity for public input rings hollow in light of the failure to disclose and take public input on the City's specific planning to meet increased housing needs in the University Community, in particular, even as the concrete outlines of these plans were taking final shape and public forums for this issue took place.

- It is notable that the City Planning Department in three years of public engagement has resisted scheduling a formal presentation to the UCPU-S by staff responsible for working on housing policy, including Blueprint SD.

- In May, 2021, Community Planning staff acceded to the specific request of the UCPU-Subcommittee to schedule a public discussion of housing, but it did not disclose its plans or proposals contained in Blueprint SD, then in final design.

- Nonetheless, at that May 18, 2021 public meeting, the UCPU-Subcommittee heard many concrete proposals for policies to stimulate the construction of affordable housing in University.

- UCPU-S members and the public expressed **special emphasis on the need to substantially increase plans for housing in University for very low, low, and moderate income households.**

- These comments and the full public Recording of the May 18, 2021 meeting of the UCPU-S (<https://www.planuniversity.org/materials>) should be entered into the record for Scoping of Blueprint SD: <https://youtu.be/UikFmncHnPY>

- See specific comments by Andrew Wiese, chair, UCPU-S, attached in Appendix 1 below.

## 5. Affordable Housing:

- As noted by the public through the UCPU-S process, Blueprint SD must address housing **affordability**, not just housing numbers.

- The Blueprint SD PEIR must evaluate and design specific policies to ensure that future policies **will meet the City of San Diego's RHNA requirements for very low, low, and moderate-income housing.**

- Nothing in the Blueprint project description assures that the city will meet or meaningfully approach its RHNA targets for very low, low, and moderate-income housing.

- If it does not, then the policy will fail.

- We know that the current SANDAG, RHNA (2021-29), housing need determination specifies that 59% of new housing is required to be made available for very low, low, and moderate income housing.

- However, our recent past indicates a vast discrepancy between what the market has built and what the city's population needs. In the past 8-year RHNA period, the market produced significant numbers of housing units, but it was the wrong type of housing to meet the demonstrable and projected need outlined by SANDAG.

- The market produced much more than needed amount of housing at the 'above moderate' and far less than its projected need in the lowest three categories – very low, low, and moderate. It produced a paltry 37 units for moderate income households – precisely the workforce style housing in need in communities like UC.

- In the UC plan area, that new 'above moderate' level housing was almost entirely at the Luxury level.

- If San Diego's past century of housing history is a guide, then luxury housing produced today will remain occupied by 'luxury' level households 50 – 100 years from now.

Past is the best predictor of the future in this case, and in San Diego, the housing produced for luxury market during the last century remains overwhelmingly in that same market today. (As a historian of housing, I would be interested to learn of a single case where a block of luxury level housing produced since the 1920s is not still occupied by a luxury class today... and if such a case exists, where this 'filtering' is not the result of subsequent racial redlining, which I hope is not part of the city's planning assumptions for its future housing stock).

- Looking ahead, it is also unreasonable to expect that luxury housing will affect the price of other levels of housing stock. It has not been the case in the past, and also because the market for this type of housing is global, corporatized and financialized.

- Nothing in the Blueprint document suggests policy designed to produce any change in construction for very low, low, and moderate income housing.

- Any expectation that the market will produce a different pattern in an environment of fewer restrictions, which is envisioned by Blueprint SD is almost certain to be unfulfilled.

**- A fundamental flaw in the Blueprint design is its focus on numbers of units rather than types and affordability levels of housing.**

- To address this failure, the Blueprint SD PEIR must closely analyze and design policies to assure that the target number of aggregate units (150,000 units) actually produces the **required numbers of affordable housing in each category of income level**.

- That is, Blueprint must assure that city policy will substantially **change** the type and income level of housing that is being produced to meet the actual housing needs of the region.

- The Blueprint PEIR must study and show data demonstrating that by-right development in TPAs in University City and other Plan Areas has any likelihood of producing affordable housing types that the city and community need at the levels and numbers that the SANDAG RHNA assessment requires.

## **6. Housing and Transit Ridership Nexus:**

- Evidence from San Diego and other parts of southern California (e.g., Los Angeles) is not encouraging that construction of Luxury housing in TPAs will increase transit ridership and reduce VMT.

- It is not enough to build luxury housing near transit and then assume that Climate Action goals will be met. This connection must be demonstrated through relevant local data and examples.

The PEIR should evaluate such studies to ensure that its proposed policies can achieve the solutions it outlines.

- The Blueprint PEIR must include specific study of types as well as numbers of housing units necessary to get city to Climate Action and VMT goals...

- Blueprint should study and produce data on transit ridership rates in connection with housing of various affordability levels to ensure that city housing policy incentivizes construction of the mix of housing types planned for University that will move the city toward meeting its VMT and Climate Action goals.

## **7. Housing and Infrastructure Nexus:**

- Blueprint SD PEIR must evaluate specific and timely plans to assure that the development of housing and infrastructure will take place concurrently.... Which is necessary to meet VMT goals... This should include study of policies to guarantee that needed bike and pedestrian infrastructure will be produced at the time of housing development and arrival of new populations. Patterns of commuting established by new residents who lack access to effective multimodal transportation options will be more difficult to break than patterns laid down at the outset when many choices are available.

- Blueprint must include evaluation of Facilities Benefits Planning/Land Value Capture planning to assure that the city can meet its infrastructure, parks, and other service needs that will grow with the development of new housing.

- At the May 18, 2021 meeting of the UCPU-S, there was significant public testimony and discussion in favor of Public Facilities Benefit Planning, including the concept of Land Value Capture and Specific Overlays for Housing and Infrastructure in TPAs. The full record of that public meeting should be entered into the record as part of the Blueprint PEIR.

See (<https://www.planuniversity.org/materials>); and <https://youtu.be/UikFmncHnPY>

### **Appendix 1:**

- In addition, the scoping record should incorporate the specific comments below. The Blueprint SD PEIR should evaluate each of the policy proposals laid out in public as part of the UC Plan Update process, including the following comments.

**Comments on Housing needs and proposed policy in the University Community Plan Update, Andrew Wiese, Chair, UCPU-S, Meeting, May 18, 2021. <https://youtu.be/UikFmncHnPY> at 59:30**

*"I believe that it is really critical that we solve the housing problem, not simply for the housing problem and the equity and access for all the people who need to live in this city as it grows but for the survival of the city as a sustainable place, the survival of the city on a climate basis, a greenhouse gas basis.*

*We are planning in UC in this Community Plan to increase commercial density extraordinarily, and in doing so we will draw tens of thousands of additional commuters to the area every day for work.*

*We are including and increasing public transit but not necessarily to those areas where most people commute from to UC today and where we can foreseeably see them commuting from in the future. So, our jobs housing balance is a threat to the future potential of the City of SD to meet its Climate Action goals and therefore for all of us to have a more sustainable future.*

*So, that's the number one reason that we need to think about housing here because bringing more housing for a workforce, the wide range of people in a workforce in UC to UC as it grows as a commercial place is essential to meeting those goals.*

*I think that that is going to require more than simply treatment in the private market, to say, 'let's just zone for more housing and therefore more housing will be built.'*

*I'm a historian, and while historians hesitate to project too far into the future, I think that's a pretty good place to look for what is about to happen next by looking at what's just happened.*

*And Katie's (K Witherspoon, City Planner) numbers give us a good basis for what's just happened and we can and should expect (RHNA numbers)*

*San Diego in the last decade has produced more than what it needs for above-moderate income housing, and much, much less than it needs for everyone else.*

*The top 20 % have gotten 85 % of all the housing produced. Low and very low income have gotten a small percentage of the rest of the 15%, most of what's left, and they've gotten that because the city and state incentivize and support that, through inclusionary bonuses, etc... And people in the middle, the middle-income proportion... have gotten in the last decade... 37 units... 37 units. Right?*

*So, I think we can expect going forward that the market will not provide for moderate income housing, will not provide for low and very low income housing unless it is incentivized.*

*So, I think it essential that we think about how we can do that at the community plan level. I think that we should demand of the city that the city use us as a place to take leadership in this process.*

*This is the place that it must work, and if it doesn't work here, then the city's Climate Action goals will fail.*

*So, what can we do?*

*I think there are a couple of tools that would be specific to the University Community Plan, and I think the city should be getting ready to plan to provide those.*

*It could include, on the one hand, **Public Facilities Benefit Planning for the entirety of the University Community**, which would include linkages between the expansion of zoning and*



planning, which will allow for much more land value - perhaps a doubling of commercial land value in the community. We should have policies that will allow us to plan linkages between that commercial development and the housing, parks, and mobility needs that we will need.

So, **Public Facilities Benefit Planning to capture increases in real estate value due to planning...** could be one way to ensure that we make sure we **write a UC Plan that includes the very low, low and moderate rate housing that we will need** in this community for the future.

Another way to do that is at a level that is a little smaller in scale than the whole community. You could do **an overlay zone, a CPIOZ**, like we already have. This plan is going to do away with those some of the old overlay zones.

This plan could write **new overlay zones** specific to this issue of housing, or perhaps related to Transit Oriented Development and it could include potential benefits and bonuses to developers who develop in that particular area to provide **more** than the city's overall housing policies provide for at this point. It could provide **more of the housing that we need**. It could provide linkages to greater park contributions. It could include greater contributions to mobility, the mobility things that we need.

Those are the two overarching strategies:

Wholesale Public Facilities Benefits planning that captures land value increases due to planning and pours those land value increases back into the community in the form of locally produced low and moderate rate housing.

Or an Overlay Zone, perhaps connected to transit stops in NE UC, to do something for smaller areas.

And then there are **some specific policies** that I think either of those two scales of policy must include. I think that it must include in University City:

An **FAR bonus for housing specific to UC**. That is to say, we should plan for our commercial development going forward at levels of density that are below what some are thinking, so that we can allow **for bonuses in density to be provided in exchange for more affordable housing, more parks, more bike lanes** and the things that we need. So, an FAR bonus could be written into the UC Plan.

We could include requirements... we could ask for and get the city to pass here and elsewhere in the city **the requirement that building of affordable housing through the city's inclusionary ordinance happens here**. So that development here doesn't pay into a fund that is insufficient to build housing somewhere else, **but that it actually gets built here**. That housing should actually be built in University City, and so we should build that into our plan.

*I think we should ask for a **higher inclusionary, affordable housing ordinance right now**. You may not be aware, but right now I think 2% is what is required by the current affordable inclusionary bonus and it's going to go to 4% next year. That's not enough to get us to where we need. **We need a higher limit for UC, perhaps 15% or 20% in University City** in an overlay zone for affordable housing here.*

*There should be **commercial linkage fees**, either through Public Facilities Benefits Planning or in an Overlay Zone that will have money that is generated in UC set aside to pay for housing and facilities to support that housing and the facilities that are necessary to go with it here in UC.*

*And we have to have **policies to protect that naturally occurring affordable housing** that already exists here in UC. We've got a problem. If we take down the housing now that is most affordable in UC in order to build housing that won't be affordable to most of us, then we are not getting any closer to solving our affordability problem in UC **even** if we are building more units.*

*There are two general schemes and some specific policies to go with it.*

*That is my contribution for now, and I look forward to hearing what others have to say."*

Thank you for your consideration and for your work on behalf of San Diego's environment.

Sincerely,

Andrew Wiese  
University City, San Diego 92122  
Chair, University Community Plan Update Subcommittee

## Stacey Higgins

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**From:** jeffstev@san.rr.com  
**Sent:** Thursday, August 12, 2021 2:32 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** Blueprint San Diego - comments on PEIR scope  
**Attachments:** Blueprint EIR Scoping Comments.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Please see attached comments on scoping of the Blueprint San Diego EIR.

Jeff Stevens  
Chair, Mira Mesa Community Planning Group

# Mira Mesa Community Planning Group

10606-8 Camino Ruiz #230  
San Diego, CA 92126



August 12, 2021

Rebecca Malone  
Senior Environmental Planner  
City of San Diego Planning Department  
9485 Aero Drive, MS 413  
San Diego, CA 92123

Re: Scoping for the Blueprint PEIR

I have the following comments on the scope of the Blueprint San Diego Program EIR.

The purpose of Blueprint is to speed up Community Plan changes so that housing can be built faster. Ever since the City of Villages concept was introduced, the promise to the residents of San Diego has been that the new housing will be accompanied by “great public facilities” and “world class transit.” However, these are expensive and the risk is that the housing is built while the transit and public facilities lag far behind, or are never realized at all. The EIR should evaluate this risk and identify the associated environmental impacts.

The EIR should identify the parks, libraries, fire stations and other public facilities needed to support the new population, and the transit needed to provide adequate transportation to the new and existing residents. The EIR should estimate the time required to plan the public facilities and transit, and the impact if housing is built before planning is complete and before adequate transit and public facilities are in place. The EIR should estimate the funding needed to provide the public facilities and transit and should evaluate the impact of the inadequate funding.

Sincerely,

Jeffrey L. Stevens  
Chair, Mira Mesa Community Planning Group

## Stacey Higgins

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**From:** Tom Mullaney <tmullaney@aol.com>  
**Sent:** Wednesday, August 18, 2021 11:57 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** Blueprint San Diego. NOP comment  
**Attachments:** Blueprint SD\_NOP Comments\_Livable San Diego-C.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Attached is a letter of comment, 3 pages, regarding the "Blueprint San Diego" project.

Thomas G. Mullaney  
Livable San Diego  
619-889-5626

# LIVABLE SAN DIEGO

www.livablesandiego.org

August 18, 2021

Rebecca Malone  
Senior Environmental Planner  
City of San Diego Planning Dept  
via email

## **Re: Blueprint San Diego. PEIR Scope and Alternatives**

The vagueness of the project makes it difficult to understand the intention, and to assess the scope and alternatives. The following comments are submitted.

1. **Project Definition.** Further project definition is needed.

a. What is the relationship of the Project to previously adopted projects? These include the Density Bonus, Complete Communities-Housing Solutions, etc.

b. A stated goal is to “focus future land use changes in each community”. If one aspect is to increase allowable density in suitable locations, will there also be efforts to decrease allowable density in less suitable locations?

c. A stated goal is to “accelerate housing production”. Will the Project differentiate between “allowable development capacity” (upzoning) and “housing production”? Will there be supporting evidence which shows that the Project can increase production, that is, induce developers to build more housing than they would otherwise?

2. **Public Facilities.** Since the Project aims to provide public facilities, including transportation improvements and parks, will the Project include phasing or concurrency requirements, to ensure that public facilities are provided at the time of need? Without adequate public facilities being planned, scheduled and funded, the Blueprint project will result in widespread unmitigated impacts to air quality, GHG emissions, historical resources, noise, etc. In the simplest terms, lack of public facilities means diminished quality of life in the neighborhoods. Residents deserve better.

3. **Three current projects.** How does the Blueprint project relate to three Community Plan projects already in work: In Mira Mesa, the University Community, and the Hillcrest neighborhood of the Uptown Community? Will the Blueprint project

override those three projects? Should the three projects be put on-hold, then restarted to be concurrent with Blueprint San Diego?

4. **Public engagement.** What steps will be taken to ensure “greater public engagement? The previous effort to conduct community plan updates in a “cluster” of three communities didn’t work well. Yet the Blueprint project aims to amend 30 to 40 Community Plans at once. How can such a massive program be carried out while ensuring meaningful public input?

5. **Community Benefits Zoning.** The American Planning Association has held forums on the advantages of Community Benefits Zoning, in which the city obtains benefits in return for the windfall profits resulting from upzoning. Will the Blueprint project include Community Benefits Zoning?

6. **Growth inducement.** If the predictable result of the Project is more development and more residents, will the growth inducement be analyzed?

7. **Unintended consequences.** How will the following impacts be mitigated?

a. **Gentrification.** One documented result of redevelopment programs is that lower income people who use transit are forced out—by higher income residents who tend to not use transit. So transit use can decrease due to upzoning and redevelopment.

b. **More vehicles, more traffic.** The immediate result of development is more vehicles, more autos, more traffic congestion, and slower average speeds. Even if 10% of the new residents use transit, walking or biking, the other 90% will use vehicles. How will the Blueprint project ensure that the upzoning of 30-40 communities will not result in unmitigated increases in air pollution and GHG emissions?

c. **Reduced parking and air pollution.** Studies have shown that up to 30% of vehicle emissions in commercial areas are due to vehicles circling, looking for parking spaces. If the Blueprint project includes the reduction or elimination of parking requirements, how will the negative impacts be mitigated?

8. **Alternatives:** The Project as described would be excessive in scope, involving amendments to 30-40 Community Plans. Predictably, the needed mitigation would be expensive, underfunded, and not adequately implemented. It would be extremely irresponsible for the City to authorized massive new development, without guaranteed public facility improvements concurrent with need.

Two alternatives should be analyzed, in addition to others:

a. A more limited project area, 5 to 10 communities, with a trial period of five years following adoption.

b. A phased program in which a maximum of 10% of the allowable development increase can be approved, until certain milestones are met, especially with transportation goals including VMT, and parks.

Thomas G. Mullaney  
Livable San Diego  
619-889-5626  
tmullaney@aol.com

Blueprint SD\_NOP Comments\_Livable San Diego-C.docx



## Stacey Higgins

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**From:** Estrada, Ansermio <Ansermio.Estrada@asm.ca.gov>  
**Sent:** Monday, July 26, 2021 4:41 PM  
**To:** Louis Rodolico; PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] RE: Blueprint San Diego, Comments from Louis Rodolico July 25, 2021

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Received. Thank you!

Yours in service,

**Ansermio Jake Estrada | District Director**  
Office of Assemblymember Christopher M. Ward  
Assembly District 78  
(619) 645-3090 | <https://a78.asmdc.org/>



---

**From:** Louis Rodolico <lourodolico@yahoo.com>  
**Sent:** Monday, July 26, 2021 10:58 AM  
**To:** PlanningCEQA@sandiego.gov  
**Subject:** Re: Blueprint San Diego, Comments from Louis Rodolico July 25, 2021

Confirm receipt requested.

On Sunday, July 25, 2021, 08:45:52 AM PDT, Louis Rodolico <[lourodolico@yahoo.com](mailto:lourodolico@yahoo.com)> wrote:

Attached Blueprint San Diego comments, please confirm receipt.

Thank You  
Louis Rodolico

## Stacey Higgins

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**From:** SDGov Webmaster  
**Sent:** Thursday, August 5, 2021 8:15 AM  
**To:** PLN\_PlanningCEQA  
**Subject:** Public Comment from Carolyn Chase

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Submitted on Thursday, August 5, 2021 - 08:14

**NOP/SCOPING MEETING:**  
(Citywide) Notice of Preparation of a Draft Program Environmental Impact Report for Blueprint San Diego

**MEETING DATE:**  
07/19/2021

**NAME:**  
Carolyn Chase

**EMAIL ADDRESS:**  
planning@iconcontactweb.com

**COMMENT:**

What are the emissions of each type of transit vehicle in the MTS fleet?  
What are the minimum ridership requirements for each of these vehicles to be reducing emissions from a set of drivers? i.e. if enough riders are using the system, the emissions from the transit vehicles could exceed the reductions - so what is a reasonable threshold of ridership for each vehicle for it to be reducing emissions? Another way to analyze: how many miles-per-transit vehicle would a driver (of a sample set of cars) have to ride in order to reduce emissions? And how many drivers would have to change to tran

Give that the major car manufacturers globally are committing to change to electric power, when will the emissions-per-vehicle-mile traveled be lower than the ridership needed to produce lower emissions via transit?

What if transit funding is not increased? What if the proposed ballot measure for tax increases for transit fund never passes?

What is the impact of the pandemic on transit ridership?

## Stacey Higgins

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**From:** SDGov Webmaster  
**Sent:** Thursday, August 5, 2021 8:23 AM  
**To:** PLN\_PlanningCEQA  
**Subject:** Public Comment from Carolyn Chase

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Submitted on Thursday, August 5, 2021 - 08:23

**NOP/SCOPING MEETING:**  
(Citywide) Notice of Preparation of a Draft Program Environmental Impact Report for Blueprint San Diego

**MEETING DATE:**  
07/19/2021

**NAME:**  
Carolyn Chase

**EMAIL ADDRESS:**  
planning@iconactweb.com

**COMMENT:**  
Please evaluate the infrastructure required for increases in population and the impacts of this infrastructure not being funded.

## Stacey Higgins

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**From:** SDGov Webmaster  
**Sent:** Monday, August 9, 2021 1:02 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** Public Comment from Carolyn Chase

Submitted on Monday, August 9, 2021 - 13:01

**NOP/SCOPING MEETING:**

(Citywide) Notice of Preparation of a Draft Program Environmental Impact Report for Blueprint San Diego

**MEETING DATE:**

07/19/2021

**NAME:**

Carolyn Chase

**EMAIL ADDRESS:**

planning@iconcontactweb.com

**COMMENT:**

1. Please include an Alternative without any additional Light Rail services 2. Consider mitigation in the form of policies implementing "Land Value Recapture" also know as Community Benefit Zoning analysis that could fund parks and other eligible climate-related community benefits such as trees to reduce urban heat island effect.

## Stacey Higgins

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**From:** Eric Ewing <ejconstruction@gmail.com>  
**Sent:** Monday, July 26, 2021 12:03 PM  
**To:** Louis Rodolico  
**Cc:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Re: Blueprint San Diego, Comments from Louis Rodolico July 25, 2021

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Confirming receipt. Thankyou. Interesting facts concerning the timeframes and how events have developed.

On Mon, Jul 26, 2021, 10:58 AM Louis Rodolico <[lourodolico@yahoo.com](mailto:lourodolico@yahoo.com)> wrote:

Confirm receipt requested.

On Sunday, July 25, 2021, 08:45:52 AM PDT, Louis Rodolico <[lourodolico@yahoo.com](mailto:lourodolico@yahoo.com)> wrote:

Attached Blueprint San Diego comments, please confirm receipt.

Thank You  
Louis Rodolico

## Stacey Higgins

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**From:** Joe Terry <thejoeterry@gmail.com>  
**Sent:** Thursday, August 5, 2021 11:52 AM  
**To:** PLN\_PlanningCEQA  
**Subject:** Public Scoping Meeting for the Blueprint San Diego Notice of Preparation  
**Attachments:** HOMES FOR ALL OF US Proposed Initiatives and comments 080521.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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My comments are attached.

## **HOMES FOR ALL OF US Proposed Initiatives and comments 080521**

**NOTE:** For all but the first comment, text from one of the related documents is followed by a comment concerning that text.

### **From the Factsheet**

**Comment 1:** This document was not prepared carefully. For example, the title of the link to the factsheet is [https://www.sandiego.gov/sites/default/files/housing\\_for\\_all\\_of\\_us\\_fact\\_sheet\\_0.pdf](https://www.sandiego.gov/sites/default/files/housing_for_all_of_us_fact_sheet_0.pdf). In addition, several critical terms are not defined. Specific examples are included in some of the following comments.

### **Proposed Initiatives**

**The citywide framework, Homes for All of Us, aims to make homes affordable for all San Diegans. It includes a collection of proposed initiatives and updates to the Land Development Code to incentivize the construction of more homes, focus development near transit, and create permanent affordability.**

**Comment 2:** Changes to the Land Development Code alone will not “make homes affordable for all San Diegans.” Therefore, the aim or purpose statement should be changed to something like “assist in making homes affordable for all San Diegans.” Substantial public (city/state/federal) funding will also be necessary. Without that, changes to the Land Development Code will not solve the homeless problem.

### **Program, Description and Details**

#### **Affordable Housing Protection for Communities**

Minimizes displacement of existing residents through redevelopment. Provides any residents affected by redevelopment enhanced protections and affordable housing options, including units dedicated for current members of the community.

Permanently require the replacement of affordable housing when it is redeveloped into new housing units.

Require development within traditionally underserved communities to offer priority preference of new affordable housing units to members of the existing community.

**Comment 3:** The first requirements will have the unwanted effect of minimizing redevelopment and preventing the revitalization of some areas.

#### **Entry-Level Housing**

Creates more availability of single-room occupancy (SRO) units, which are the first rung on the housing ladder, often serving those at risk of homelessness.

Create additional programs to construct SRO units and rehabilitate and preserve existing SROs to provide more entry-level living options for the unhoused population.

#### **Affordable Housing in All Communities**

Update City codes to allow for more affordable homes in communities with little to no affordable housing that are close to job centers, quality schools, transit and parks.

**Comment 4:** What does “close to” mean?

•Allow 100% affordable/middle income housing developments Location must also be High/Highest Resource Areas and Transit Priority Areas (TPAs).

**Comment 5:** What is a High/Highest Resource Area and does it have to be a TPA now or in some unspecified time in the future?

Incentivize Climate Friendly Housing Development Near Transit

**Comment 6:** What does “near transit” mean?

Intended to catalyze development in transit-supportive areas like El Cajon Boulevard

**Comment 7:** What are transit-supportive areas?

#### **From the Public Notice**

**PUBLIC NOTICE:** The City of San Diego (City) as the Lead Agency has determined that the project described below will require the preparation of a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA).

**Comment 8:** A brief summary of “the project” would be very useful. Is it just changes to the Land Use Code via changes to the General Plan and Community Plans, or does it also include infrastructure funding or planning for that funding?

Community plans work together with the General Plan to provide location-based policies and recommendations in the City's 50 community plan areas.

**Comment 9:** Will the proposed changes to the General Plan and the Land Use Code severely limit the ability of the Community Plans to provide location-based policies and recommendations in the City's 50 community plan areas?

The General Plan and Community Plans play a critical role in meeting the City’s Climate Action Plan goals and contributing to the region’s mobility vision and needs, by identifying land uses and public improvements that work toward achieving the Citywide mobility mode share targets that reflect quantified greenhouse gas emissions. As the City and State have shifted away from accommodating additional vehicular travel, to instead focus on reducing vehicular travel through strategic land use planning – primarily by locating new development near transit - and investments in walking, bicycling, and transit improvements, proactive and comprehensive land use planning is more critical than ever.

**Comment 10:** Aren’t the City’s Climate Action Plan goals going to be met primarily with the expected shift to low or no emission vehicles. Isn’t that shift likely to occur more quickly and contribute more to reducing greenhouse gas emissions than changes in the Land Use Code?

**Comment 11:** In support of the City’s Climate Action Plan goals, does “the project” include protection for greenspaces and pervious surfaces on private land? If the answer to the question in the previous comment is yes and the answer to this question is no, using reductions in greenhouse gas emissions to support “the project” is disingenuous.

Community plan updates provide land use maps and designations to address housing and employment needs and to target the connection between our residents and jobs to reduce vehicle miles traveled through safe and efficient



mobility options. They establish new and updated policies that address community or neighborhood-specific issues consistent with the General Plan and identify new and improved public facilities and infrastructure needed to serve local and citywide residents and visitors. Community plan updates may also contain community-specific supplemental development regulations, zoning amendments, urban design policies, and other measures to implement the updated Community Plan.

**Comment 12:** It is critical that Community Plan updates also contain community-specific supplemental development regulations, zoning amendments, urban design policies, and other measures to implement the updated Community Plan. Will “the project” ensure that happens?

Blueprint San Diego is a new approach to comprehensive Citywide planning that will proactively identify the City’s housing, climate, and mobility goals and implement them throughout the City at the community plan level in a way that reflects the unique characteristics of each community.

**Comment 13:** Which parts of “the plan” ensure the plans “reflects the unique characteristics of each community”?

This approach will provide an equitable framework for future development throughout the City that advances the City’s environmental justice goals.

**Comment 14:** What are those goals? They should be stated or a link to the goals should be included. This comment applies to other goals references in this document.

Blueprint San Diego will establish land use and mobility thresholds to identify appropriate land uses in areas near and within future and existing Transit Priority Areas.

**Comment 15:** The phrase “in areas near and within future and existing Transit Priority Areas” is critical but almost meaningless with defining the terms “near” and “Transit Priority Areas” and explaining how future TPAs will be identified. Are they based on highly speculative plans/hopes with no dedicated funding or is there a reasonable degree of certainty that a specific area will become a TPA?

### **Land Use and Mobility Thresholds for Future Community Plan Updates**

Blueprint San Diego will identify minimum housing and employment intensities for areas near and within future and existing Transit Priority Areas throughout the City. These thresholds will identify the levels of development necessary to further the citywide transportation mode share goals of the Climate Action Plan for walking, bicycling, and transit. Transit Priority Areas are defined in State law as an area within one-half mile of a major transit stop that is existing or planned for in a regional transportation plan. It is anticipated that these thresholds would be used to guide future community plan updates to identify the land uses and intensities to implement Blueprint San Diego.

**Comment 16:** What is a “major transit stop” and how does it differ from other types of stops? With what certainty do we know when or if a major transit stop planned for in a regional transportation plan will occur?

### **Land Use and Mobility Thresholds and Objective Design Standards**

All activities associated with implementation of the minimum housing and employment intensities thresholds and objective design standards would be located within the City’s geographic jurisdiction. The City of San Diego land area covers nearly 372 square miles and is in the southwestern corner of California, within the County of San Diego. Figure 1 shows the City of San Diego boundary as well as the

City's current Transit Priority Areas. It is anticipated that a majority of future population growth would occur within and near existing and future Transit Priority Areas.

**Comment 17:** Figure 1 shows the 2035 TPAs, what are the current TPAs and how sure are we about what they will be in 2035?

From: MEDIA RELEASE: City of San Diego Seeks Public Input on 'Homes for All of Us' Housing Package

This month, the City will hold public workshops on the proposal, which outlines 11 potential amendments and updates to City development regulations and property use to encourage the construction of more homes, focus development near transit hubs and create permanent housing affordability, among others. Workshops are being held via Zoom on Wednesday, Aug. 4, and Monday, Aug. 16.

**Comment 18:** What is a "transit hub" and what does "near" mean?

## Stacey Higgins

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**From:** Louis Rodolico <lourodolico@yahoo.com>  
**Sent:** Sunday, July 25, 2021 8:46 AM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Blueprint San Diego, Comments from Louis Rodolico July 25, 2021  
**Attachments:** DEIR Response Blueprint San Diego.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Attached Blueprint San Diego comments, please confirm receipt.

Thank You  
Louis Rodolico

# Blueprint San Diego

Comment: Louis Rodolico - University City South

E-Mail: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov) July 25, 2021

Conservancy groups want to re-wild areas in the city, but in my opinion we must first re-humanize conservancy groups and take the profit out of harming us and the environment. Conservancy groups explain that they are not environmental groups, their primary goal is to eliminate parts of civilization they do not like regardless of the safety consequences to humans. Their profit model brings harm and hate to University.

The unique characteristic of University is the hate that pits the privileged in the West with the rest of the community. Law enforcement and the judiciary are helpless in the face of hate in University as evidenced by their inability to solve the 50 million dollar, 2003 Crossroads Fire, the biggest eco-terrorist act in US history, right here in University. In 2004 this fire ushered the lobbying firm The Friends of Rose Canyon (FORC) into power.



FORC continues to run University to this day. In fear of another arson the city gives them whatever they want; no bridges, no new housing on undeveloped land, no four foot diameter high pressure sewer lines in canyons (but yes in our front yards), no Regents Road connection of any kind across Rose Canyon and no canyon bike paths, parking etc.

Just last week FORC with the support of planner Witherspoon lied to the community at the planning meeting about the status of a housing project. They stated that it could not be built on open space. It was an RM-1-1 parcel which allows for open space along with apartments. Using the term open space as a designation for undeveloped land invites confusion. By calling it open space the city allows FORC to play the victim, openly pleading for help which will create space for yet another arson. If the developer prevails they probably will have trouble getting insurance for wood framing in University. With the strong probability of arson, they should be encouraged to go forward with non-combustible construction. No 3-4 story wood frame apartment has been built in University since 2003.

Our well paid FORC lobbyist Debby Knight has made over ¾ million dollars based on public filings, but that does not include corporate dark money, which is not public.

Unfortunately public safety doesn't come first in University. Municipal agents continue to reward conservancy groups out of fear of another 50 million dollar, 2003 Crossroads fire, the biggest eco-terrorist event in US history. They continue to green light expansive projects like Westfield Mall and Costa Verde while ignoring the deadly effects of Universities incomplete road system. Which increases Ambulance service times and according to county statistics causes 7 of us die each year as the result of our incomplete road system. What is environmentally or morally correct about that?

Blueprint San Diego proudly states that it intends to reduce: "City's greenhouse gas emissions reductions targets through reduced Citywide vehicle miles traveled" a hollow promise given only one of South Universities three main roads has been allowed by planning. We have to drive additional miles because of unbuilt roads, resulting in millions of pounds of carbon added to the atmosphere each year. See following article:

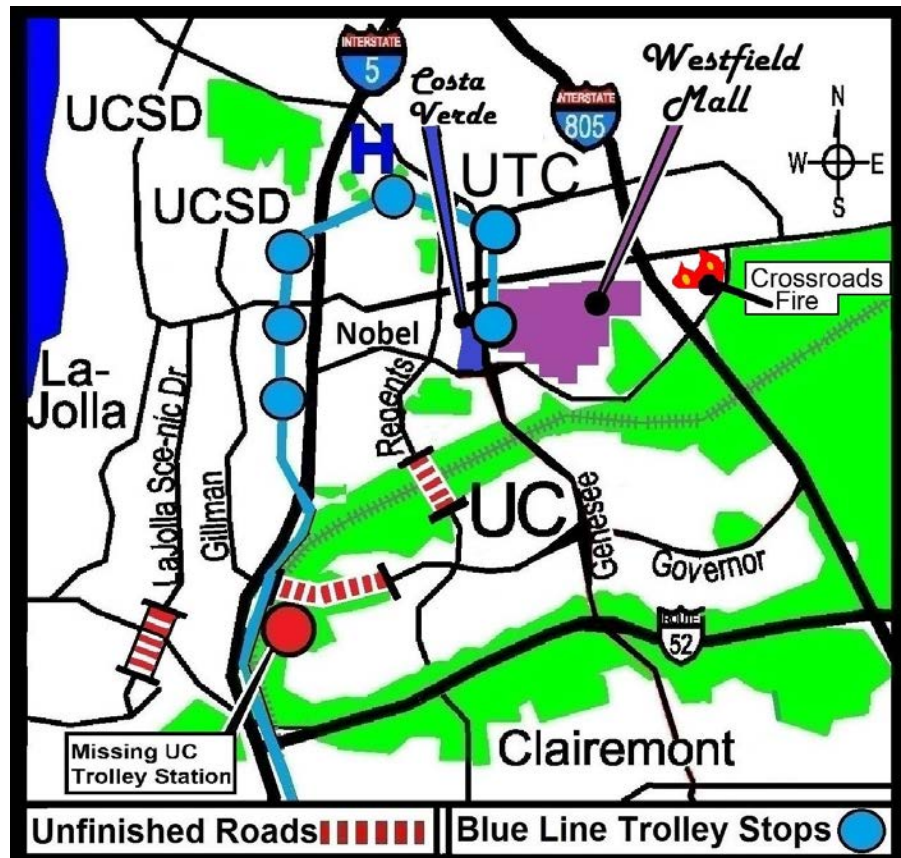
## Universities Unfinished Roads and Missing Train Station

Opinion: Louis Rodolico

In our area there are 3 unfinished roads. Which are represented in the graphic by the red and white dashed lines. City planning maps also showed a train station at the location of the red dot.

In 2000 the Governor to Gilman connection was taken off the plan in the run-up to the design of the Blue Line Trolley. Without this road SANDAG did not provide a west UC train station with the new Blue Line Trolley. Most trolley stops are a mile or two apart, the distance between Nobel and Balboa is 5 miles.

The Friends of Rose Canyon was created in the run-up to the 2006 Regents Road Bridge vote. This first attempt to remove the Regents Road Bridge failed, largely due to the extensive testimony of fire officials.



University Community Planning Group (UCPG) membership then came under control of well paid lobbyists and to this day the two thirds of the community who want the bridges built are systematically banned from their local community planning group.

In 2008 two rookie politicians Todd Gloria and Sherri Lightner were swept into office. Both were from districts with a Westfield Mall. Eager to please, the pair got control of a transportation subcommittee that voted against the Regents Road Bridge in 2010. Both Gloria and Lightner sat on the SANDAG board.

Unlike in 2006, public safety officials did not testify in 2016 during the second and successful attempt to take the Regents Road Bridge off the plan. Westfield Mall paid half a million dollars for an EIR which excluded ambulance service times (See Link). Ever careful to keep the bridge off the ballot, lobbyists pitted neighbor against neighbor, diverting eyes away from Westfield.

Westfield wanted something in return for agreeing to use union labor for its 600 million dollar expansion. What they got was all traffic funneled up Genesee to their new stores, cheating the shopping centers on Regents Road. Also by not building the west UC train station Westfield's new parking structure will harvest south UC trolley commuters. Not

finishing our road system increases driving miles by forcing residents onto freeways to travel within their own community adding millions of pounds of carbon to the atmosphere each year, along with; traffic back-ups, wasted man hours and gasoline. Ambulance service times and risk to first responders are increased, conflagration egress paths removed along with bike and pedestrian access.

Many tell me “Lou University bridges are a dead issue” In one aspect they are correct. Based on county statistics, these missing roads/bridges delay ambulances proving fatal for 7 of us each year.

Unfortunately we cannot trust a foreign owned corporation like Westfield to put our safety above their profits. We need more transparency and less corporate dominance of government.

[louisrodolico.com](http://www.louisrodolico.com)

Link: [http://www.louisrodolico.com/uploads/7/5/2/2/75221087/dif\\_exhibits.pdf](http://www.louisrodolico.com/uploads/7/5/2/2/75221087/dif_exhibits.pdf)

*End of Article*

### Conservancy Groups Harming Humans

Civilization is losing an ongoing war with conservancy groups. Recently a pure water manager lied to the public and kept high pressure sewage lines out of canyons and on public streets, where if there is a failure people will be in harm’s way (Red dashed path at right) He did it by pushing the utility relocation costs onto SDGE and then taking the costs off the red scenario his vendors wanted. The red dashed path is also the one that goes up 11 hills venting sewer gas into the neighborhoods instead of using it to make electricity. Google: *Pure Water Squabbles Over Change Orders Before Their Project Goes Out To Bid*. By cheating us he was rewarded with a prestigious position at the Zoo, aka Conservancy Xanadu.

There is an ongoing pattern with conservancy groups; of harming humans to avenge nature. Like releasing sewer gas next to homes. Not building bridges in University harms humans by delaying ambulances killing seven each year. Harming humans has become a badge of conservancy honor. If scores perish during a conflagration because of the lack of roads will that be another point of pride for conservationists?

Conservancy groups tried to eradicate Campland which is an affordable vacation venue. Conservancy groups torched crossroads an affordable housing complex.



Conservancy groups are bastions of white privilege and there was fear of the brown and black “other” coming to University if the Regents Road Bridge were built.

There is no statute of limitations on crimes involving the killing of humans. Law enforcement should engage with human behavior experts and stop cow towing to conservancy groups even if they remain a threat to torch projects. Stop playing the coward.

### **Corruption in University**

There are three uncompleted bridges in our area shown as the red and white striped roads on the regional map. For decades the big retailers on Genesee have financed closing down roads so all commuters are funneled up Genesee to their stores. This boosts rents. We know retailers worked secretly with lobbyists, keeping the details of their meetings from the public eye. As a distraction they pitted neighbor against neighbor.

To the victors go the spoils. In this case the spoils are all traffic and therefore customers funneled up Genesee. More cars = higher Westfield and Costa Verde rents. The losers are the shopping centers on Regents Road and all residents saddled with additional traffic loads in east UC. Westfield paid a half million for an Environmental Impact Report to remove the Regents Road Bridge. A report that somehow did not include ambulance service times. Many tell me that the Regents Road Bridge is a dead issue, in one way they are correct since, according to county statistics, 7 of us die prematurely each year due to extended emergency vehicle service times.

When the Regents Road Bridge was taken off the plan mitigation measures like conflagration egress were identified. Thousands of residents will be heading north on Genesee seeking refuge during a conflagration. Fire officials testified in 2006 to build the bridge. Council member Lightner had their pensions removed in 2012. Faced with further sanctions fire officials did not testify at the 2016 Council bridge hearing.

There will soon be three large concrete parking garages at Nobel and Genesee which should remain open as emergency conflagration shelters.

A conflagration shelter is not a wish for a fire. Like the hydrants on your street it is preparation for a fire. If you and your family are fleeing a conflagration your destination should be a San Diego Emergency Shelter.

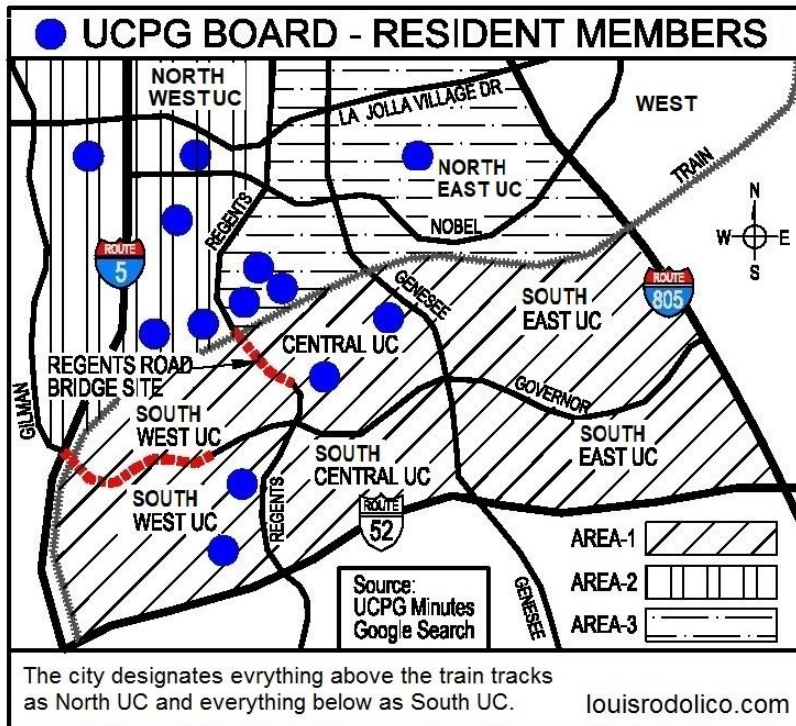
Since only one of the three major roads have been completed in UC south every parking garage at Nobel and Genesee should have this city sign to the right prominently displayed.

Well paid lobbyists ran the Costa Verde transportation committee and wrote the University Community Planning Group (UCPG) community response for the new Costa Verde Expansion. In service of their client lobbyists rejected public safety recommendations including making the new parking garage at Costa Verde a conflagration shelter. Why are lobbyists writing the community UCPG response anyway? And why does the city consistently give them the power to push residents away? Money, Money, Money.



Most residents see that key municipal decisions are made before a project is introduced to the public. Corporate lobbyists are well paid, more development without roads endangers us further, while municipal managers remained stunned and ineffective from the 50 million dollar crossroads eco-terrorists fire. The private apologies from municipal managers fall hollow.

Maybe start with something small. I live in South East UC Area 1. I became involved in



local politics in 2015. I was told then because I lived in South East UC there is no way the lobbying firm Friends of Rose Canyon would allow anyone from Southeast UC to get any vote on the community planning group. They were right, lobbyists have made lucrative arrangements and no one from Southeast UC has been on the UCPG board for over 12 years. Our Planning Group excluded 2/3 of the community because of their support for the Regents Road Bridge, this is what can happen when we try to privatize democracy. The map to the left shows where UCPG members live and you can see that

South East UC has not one sitting board member. Even having a south eastern resident vote on a sub-committee is something lobbyists will fight. It's not personal it's money.

So here is a possible step; In South UC make; West, Central and East UC separate UCPG voting districts so someone from East finally has a vote. Lobbyists directly control UCPG membership and they will fight it. Dark money wants residents west of Genesee and does not want any East UC residents(downwind of sewer vents) on the UCPG board.

I am a UCPG non-board member from southeast UC. When I tried to get on the Costa Verde sub-committee the UCPG chair lied about a rule that excluded me from the sub-committee. The chair pointed to a rule I proved does not exist. As always planning managers tacitly approved of my exclusion with their silence. With the path cleared a paid lobbyist wrote the community traffic response, removing public safety concerns that would cost Costa Verde money. The same lobbyists fought clearing brush near houses at canyon rims, if something can harm humans and destroy property conservation lobbyists are all in.

I would like to see Blueprint San Diego be a success but we have to stop kidding ourselves. With the current blueprint; Planner Careers, Lobbyists Payoffs, Corporate Profits & Dark Money runs things in San Diego. Get lobbyists and for-profit mongers out of community politics, build the bridges, stop killing us, and start including our health and deaths in all environmental calculations. Start by to re-humanizing Conservancy Groups.

Thank You

Louis Rodolico

July 25, 2021



## **Additional Articles:**

### **Collisions at Governor & Genesee**

[http://www.louisrodolico.com/uploads/7/5/2/2/75221087/collisions-at-governor-genesee-cut-branches\\_orig.jpg](http://www.louisrodolico.com/uploads/7/5/2/2/75221087/collisions-at-governor-genesee-cut-branches_orig.jpg)

### **Council Action to up "Granny Flats" La Jolla Light 9-14-17 Page 22**

[https://issuu.com/lajollalight2010/docs/la\\_jolla\\_light\\_09.14.17](https://issuu.com/lajollalight2010/docs/la_jolla_light_09.14.17)

### **Pure Water Project Stinks, and Added Costs Are White-Collar Crime**

<https://timesofsandiego.com/opinion/2019/03/07/opinion-pure-water-project-stinks-and-added-costs-are-white-collar-crime/>

### **How Would Pasteur Heal Today's Body Politic?**

<https://clairemonttimes.com/how-would-pasteur-heal-todays-body-politic/>

### **Attorney Voice Article Linking FORC Lobbyist and Westfield Mall**

<https://www.voiceofsandiego.org/topics/government/thirty-something-brother-and-sister-and-atop-san-diego-politics/>

**Monroe, Daniel** <DMMonroe@sandiego.gov>

03/30/16 at 12:49 PM

To: Louis Rodolico

Hi Louis,

The traffic analysis and associated environmental analysis are being funded through a contribution of \$500,000 by Westfield UTC as a condition of their permit for the Revitalization Plan. Here is the actual wording in the resolution approving use of these funds for this effort. I've also attached the complete City Council Resolution.

"WHEREAS, funding from developer contributions, specifically the University Towne Center Master Planned Development Permit No. 4103/Site Development Permit No. 293783, Condition 118, a contribution of \$500,000 toward the preparation of a mobility plan for the University Community area, has been identified for the purpose of developing the scope of work and costs for the technical and environmental analyses required to complete the CPA; NOW,"

**Dan Monroe**

Senior Planner  
City of San Diego  
Planning Department  
1010 Second Ave, Suite 1200 East Tower, MS 413  
San Diego, CA 92101

T (619) 236-5529

[dmmonroe@sandiego.gov](mailto:dmmonroe@sandiego.gov)

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**From:** Louis Rodolico [mailto:lourodolico@yahoo.com]

**Sent:** Wednesday, March 30, 2016 12:42 PM

**To:** Monroe, Daniel <DMMonroe@sandiego.gov>

**Subject:** EIR Funding Source?

Dan:

What is the source of funding for the Traffic Study EIR?

Thank you  
Louis Rodolico

**Note: At this point in time the EIR in question was for the Removal of the Regents Road Bridge from the city plan.**

## Stacey Higgins

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**From:** Louis Rodolico <lourodolico@yahoo.com>  
**Sent:** Monday, July 26, 2021 10:58 AM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Re: Blueprint San Diego, Comments from Louis Rodolico July 25, 2021  
**Attachments:** DEIR Response Blueprint San Diego.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Confirm receipt requested.

On Sunday, July 25, 2021, 08:45:52 AM PDT, Louis Rodolico <lourodolico@yahoo.com> wrote:

Attached Blueprint San Diego comments, please confirm receipt.

Thank You  
Louis Rodolico

## Stacey Higgins

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**From:** Mat Wahlstrom <mat92103@yahoo.com>  
**Sent:** Wednesday, August 18, 2021 3:44 PM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Blueprint San Diego

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To Ms. Rebecca Malone and whom it may concern,

The scoping of this PEIR assumes but does not address that the project proposes to adopt programmatic policy changes that are akin to legislative actions. As such, it is a surreptitious attempt to enact changes to state and local laws beyond specific zoning and land use measures by removing the deliberation and decision making on these issues from the purview of public participation entirely.

The project as currently proposed is an attempt to circumvent the purpose and jurisdiction of community planning groups (CPGs) as codified under City Council Policy 600-24, as well as the rights of the public under section 45950 of the Brown Act (that "the actions of public bodies be taken openly and that their deliberations be conducted openly"), in addition to suborning violation of Article I Section 3 of the California Constitution.

Also, any part of this project that proposes a programmatic removal of the right of CPGs to advise on any of the 19 environmental issues identified as falling under CEQA would themselves be violations of CEQA, in addition to the California Constitution, the Brown Act, and Council Policy, and so must be removed from it.

Respectfully yours,

Mat Wahlstrom  
3925 1/2 Centre St  
San Diego, CA 92103

## Stacey Higgins

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**From:** Rebecca Robinson Wood <rsrobinsonco@gmail.com>  
**Sent:** Tuesday, August 17, 2021 9:57 AM  
**To:** PLN\_PlanningCEQA  
**Subject:** [EXTERNAL] Blueprint San Diego

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Andy Pindoli, MIG

Heidi Vonblum, San Diego Planning Department

The program appears to be a wonderful program to provide much needed housing, including housing affordable to our working residents and families in the City.

Thanks to Mayor Todd Gloria and city staff and consultants for this effort to address the Housing Crisis.

I want to point out the California State law SB743 defines a transit priority area as a half mile radius of a transit center. I believe that the City of San Diego Development Services Department, July 2021 has amended the Municipal Code to reflect this and has determined, if any part of a property falls within the half mile radius, the entire site is to be included in the transit priority area.

If you may, please amend your Transit Priority Map to reflect the present rulings. Thereby, removing the impediments to the realization of the Mayor's vision for the future, rendering the Housing Crisis only a distant memory.

I will appreciate your efforts for the good of all.

Thank You.

Rebecca Robinson Wood